

A04: ANTI-BRIBERY AND CORRUPTION POLICY (NOVEMBER 2022)

4.1 INTRODUCTION

Summary and Purpose

The purpose of this policy is to identify the risks of bribery and corruption in the work of REDRESS, and set out procedures to mitigate those risks and respond to any incidents that may occur.

Scope

This policy applies to:

- All staff employed by REDRESS.
- Associated personnel while they are engaged with work or visits related to REDRESS, which includes but is not limited to: trustees, consultants, volunteers, interns, and contractors.
- The staff and associated personnel of our partner organisations when implementing REDRESS's programmes and activities, unless it has been agreed that the partner organisation will enforce its own policy.

Specific policies might be developed where REDRESS implements a project where there is an enhanced risk.

4.2 POLICY STATEMENT

REDRESS has a zero-tolerance approach towards the payment or receipt of bribes or of corruption in any form.

We aspire to promote best practice and to comply with relevant laws in all jurisdictions in which we operate.

All trustees, staff, and associated personnel are required to adhere to this policy.

4.3 ANTI-BRIBERY PROCEDURES

There are six areas where specific risks of bribery and corruption have been identified in the work of REDRESS.

1. Gifts and hospitality

No staff or associated personnel may accept directly or indirectly any gift, discount, entertainment (including meals, cultural event or entertainment), favours (i.e. gifts), or hospitality (meals, transport, or accommodation) that may influence or may be perceived to influence their exercise of their function or the performance of their duties. Nor may they offer such gifts or hospitality that may influence or be perceived to influence improperly the actions of other persons (including foreign public officials).

Any cash gift is refused.

Any gift or hospitality with a value of more than £50 shall be reported to the Director, who will keep a register of any such gifts and report periodically to the Risk Committee of the Board.

The REDRESS policy is that expenses should be refunded against actual receipts, rather than through the payment of notional *per diems*, although sometimes this is the only option (e.g. the United

Nations). Staff or Associated Personnel should consult with the Director or the Head of Finance before accepting a *per diem*, particularly one paid in cash.

2. Overseas Travel

Facilitation payments (i.e. small payments normally to officials to speed up bureaucracy) are bribes and are illegal.

Staff and associated personnel should not make such payments. Nor should our partners and contractors. Where there is suspicion that such a payment is unlawful, the payment should only be made if the official or third party can provide a formal receipt, or written confirmation of its legality.

If any demand for payment is accompanied by the threat of physical harm then the over-riding principle is to put safety first. In such circumstances a report should immediately be made to the Director.

REDRESS will also report any such incidents to the relevant authorities.

3. Fundraising

There is a risk of corruption where a donor may seek to compromise the independence of REDRESS by influencing improperly the policies, activities, or decision making of the charity. REDRESS will not accept donations that impair its independence or endanger its integrity and reputation.

4. Conflicts of interest

Conflicts of interest can cause staff or associated personnel to take decisions or appear to take decisions that are based on personal interest and not the interest of the charity. Trustees and senior management are required to declare any potential conflicts of interest.

5. Working with Partners

There is a risk of corruption with any third-party agreement with consultants or partners. REDRESS's financial rules require using a preferred supplier, or conducting a tendering process for any contract above a minimal value. The partnership agreement or consultancy agreement requires adherence to this policy, and any agreement can be terminated where there is a breach of this policy. Due diligence will also be carried out before any new partnership is entered into, which may include training on our financial and other procedures.

6. High Risk Projects

Where staff recognise that a project has a particular risk of bribery or corruption, such as where it involves significant use of cash payments, then a specific risk assessment will be conducted for that project.

4.4 REPORTING

Any person wishing to make a confidential report of a breach of this policy can do so following the procedure in *A13: Complaints Policy*.

Anyone making a complaint will be protected by *A5: Whistleblowing Policy*.

It is a disciplinary matter either to victimise a *bona fide* whistleblower or to maliciously make a false allegation.

Any breach of this policy is likely to amount to a 'major incident' and must be reported immediately to the Charity Commission, to the donor whose money has been stolen, and to our larger donors.

4.5 OVERSIGHT

The Risk Committee of the Board will review the operation of the policy twice a year as part of the Risk Management process.

4.6 ASSOCIATED POLICIES

Staff should be aware of the following associated policies.

- A3: Anti-Bullying and Harassment Policy
- A5: Whistleblowing Policy
- A13: Complaints Policy

4.7 TRAINING

All staff and associated personnel will receive training on this policy as part of their induction. See *A4(a): Anti-Bribery and Corruption Training Outline*. REDRESS keeps a training record that identifies who was trained on what date.

A refresher training session is conducted for all staff at least annually to remind them of the policy and to inform them of any changes.

4.8 POLICY REVIEW

This policy was first approved by the Board of Trustees on 10 November 2020. It was reviewed by the Risk Committee on 28 October 2022, and the revised policy was approved by the Board of Trustees on 8 November 2022.

This policy is subject to revision at any time REDRESS considers it necessary to do so.

In any event, the policy will be reviewed again in November 2025.

4.9 FORMS AND DOCUMENTS

- A04(a): Anti-Bribery and Corruption Training Outline.