



St Albans Diocesan Board of Finance

ANTI-BRIBERY POLICY

Approved by: Diocesan Board of Finance
Policy originator: Glyn Barker, Finance Director
Accessible at: Diocesan Website
Date approved: 18 May 2026
Review period: Three years
Next Review Date: 18 May 2029

Policy Statement

Bribery is a criminal offence. The Board and those acting on its behalf does not, and will not, pay bribes or offer improper inducements to anyone for any purpose, nor does it or will it, accept bribes or improper inducements, or use a third party as a conduit to channel bribes.

The Board is committed to the prevention, deterrence and detection of bribery. It has a zero- tolerance towards bribery.

Objective of this policy

This policy provides a framework to enable those acting on behalf of the Board to understand and implement arrangements enabling compliance.

The Board requires that all personnel, including those permanently employed, office holders, trustees, temporary agency staff and contractors:

- act honestly and with integrity at all times and to safeguard the organisation's resources for which they are responsible
- comply with the spirit, as well as the letter, of the law

Scope of this policy

This policy applies to all of the Board's activities and covers all personnel, including those permanently employed, temporary agency staff, contractors, trustees, agents, volunteers and consultants.

Commitment

The Board commits to:

- Setting out a clear anti-bribery policy and keeping it up to date
- Making all employees aware of their responsibilities to adhere strictly to this policy at all times
- Training all employees so that they can recognise and avoid the use of bribery by themselves and others
- Encouraging its employees to be vigilant and to report any suspicions of bribery, providing them with suitable channels of communication and ensuring sensitive information is treated appropriately
- Rigorously investigating instances of alleged bribery and assisting police and other appropriate authorities in any resultant prosecution
- Taking firm and vigorous action against any individual(s) involved in bribery
- Provide information to all employees to report breaches and suspected breaches of this policy
- Include appropriate clauses in contacts to prevent bribery.

Bribery

Is an inducement or reward offered, promised or provided to gain personal, commercial, regulatory or contractual advantage.

The Bribery Act

There are four key offences under the Act:

- bribery of another person (section 1)
- accepting a bribe (section 2)
- bribing a foreign official (section 6)
- failing to prevent bribery (section 7)

The Bribery Act 2010 (http://www.opsi.gov.uk/acts/acts2010/ukpga_20100023_en_1) makes it an offence to offer, promise or give a bribe (Section 1). It also makes it an offence to request, agree to receive, or accept a bribe (Section 2).

Bribery is not tolerated

It is unacceptable to:

- give, promise to give, or offer a payment, gift or hospitality with the expectation or hope that a business advantage will be received, or to reward a business advantage already given
- give, promise to give, or offer a payment, gift or hospitality to a government official, agent or representative to "facilitate" or expedite a routine procedure
- accept payment from a third party that you know, or suspect is offered with the expectation that it will obtain a business advantage for them
- accept a gift or hospitality from a third party if you know or suspect that it is offered or provided with an expectation that a business advantage will be provided by us in return
- retaliate against or threaten a person who has refused to commit a bribery offence or who has raised concerns under this policy
- engage in activity in breach of this policy.

Facilitation payments

Facilitation payments are not tolerated and are illegal. Facilitation payments are unofficial payments made to public officials in order to secure or expedite actions.

Gifts and hospitality

The Act does not prohibit genuine hospitality. Reasonable, proportionate gifts and hospitality made in good faith and that are not lavish are acceptable but should be declared by notifying the Diocesan Secretary who will keep a register of gifts and hospitality received.

Staff responsibilities

The prevention, detection and reporting of bribery and other forms of corruption are the responsibility of all those working for the Board or under its control. All staff are required to avoid activity that breaches this policy.

You must:

- ensure that you read, understand and comply with this policy
- raise concerns as soon as possible if you believe or suspect that a conflict with this policy has occurred or may occur in the future.

As well as the possibility of civil and criminal prosecution, staff that breach this policy will face disciplinary action, which could result in dismissal for gross misconduct.

Raising a concern

The Board is committed to ensuring that everyone has a safe, reliable, and confidential way of reporting any suspicious activity.

If you have a concern regarding a suspected instance of bribery or corruption, please talk to the Diocesan Secretary or the Chair of the DBF as soon as you have concerns.

The Board is committed to ensuring nobody suffers detrimental treatment through refusing to take part in bribery or corruption, or because of reporting a concern in good faith.