

Title of Policy:	Section:	KLOE Reference(s):
Anti- Bribery, Gifts and Wills	Human Resources	Safe Well Led
Regulation(s) directly linked to this Policy	13: Safeguarding service users from abuse and improper treatment	
Regulation(s) relevant to this Policy	18: Staffing	

Purpose

The purpose of this policy is to set out the rules that must be followed by everyone in the Company so as to ensure that all dealings with Clients, Suppliers etc. are always appropriate, honest and above-board.

Statement

The Company's reputation is based on a number of factors, with quality of service, integrity, honesty and professionalism being of the highest importance. It follows that any act which might cast doubts about the Company's behaviour in relation to these factors is to be deplored.

Procedure and Guidance

Unacceptable behaviour

Bribery is the accepting of gifts, money, hospitality or other favours in return for providing something of value to the briber.

The following behaviour is unacceptable:

- accepting any financial or other reward from any person in return for providing some favour;
- requesting a financial or other reward from any person in return for providing some favour;
- offering any financial or other reward from any person in return for providing some favour.

Business gifts

From time to time, Clients, suppliers or other persons might offer a gift to an employee. This could be a small item, or something of considerable value. All gifts, however small, must be reported and recorded. No gifts with a value of more than [insert amount] may be accepted. If a gift is offered and then refused because of its value, this must be reported. Where refusal might cause offence (for example the gift is offered as appreciation for an exceptional quality of care and support), then this should be discussed with the employee's line manager and appropriate action decided upon.

Hospitality

From time to time, customers, suppliers or other persons might invite an employee to a hospitality event. All such invitations must be reported and permission must be given before an employee accepts any invitation.

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This policy was implemented/reviewed on ? The date of the next review is ?

This model requires the approval of the purchaser prior to implementation

Offering gifts and hospitality

It is the custom on occasion to offer small gifts of nominal value (e.g. pens, diaries) to customers, suppliers and other persons. If a gift is authorised the employee is entitled to give it to the appropriate individuals. A record must be kept of all gifts. The Company occasionally runs hospitality events, primarily aimed at thanking customers and suppliers for their custom and loyalty. An employee must not organise any additional hospitality event without seeking prior authority.

Attempts to bribe

Any employee who is concerned that he or she is potentially being bribed should report this matter immediately.

Clients' Wills and Bequests

Employees are expressly forbidden to become involved in assisting in the making of or benefiting from Clients' wills. As such Care and Support Workers and other employees of the Company must refuse to offer any advice whatsoever, either to the Client, or anyone connected with the Client, on the making of wills, or their contents.

As with gifts, however, a sensible approach must be adopted where refusal may offend, and if a bequest is made to a Care and Support Worker, or some other employee, without his or her prior knowledge, then this must be declared. If, after investigation, the Company is satisfied that nothing untoward has taken place, then the bequest may be accepted. Where a monetary bequest is made to the Company then such monies may be used for the benefit of all employees.

Donations to organisations

The Company makes regular donations to charity. No employee should make donations to a charity without approval. No donations should be made to charities, political parties or other organisations with the intention of gaining a business advantage.

Disciplinary action

Any employee found to have offered or accepted a bribe, or is believed to have committed an act in contravention of any of the proper standards of conduct outlined in this policy will face disciplinary action which could include dismissal for gross misconduct.

Raising concerns

If an employee is concerned that acts of bribery are occurring in the Company they should inform their line manager in the first instance. If this course of action is inappropriate, the employee should inform another senior manager.