

Anti-Bribery Policy

1 Introduction

- 1.1 This policy applies to employees, volunteers and Board members of North Halifax Partnership (NHP). This policy also extends to agency/supply staff and sub-contractors.
- 1.2 Bribery is an inducement or reward offered promised or provided in order to improperly gain any commercial, contractual, regulatory or personal advantage, which may constitute an offence under the Act, namely:
 - giving or offering a bribe;
 - receiving or requesting a bribe; or bribing a foreign public official
- 1.3 NHP applies a zero-tolerance approach to bribery and corruption at all levels. The prevention, detection and reporting of bribery and other forms of corruption are the responsibility of all those working with, or for, NHP.
- 1.4 It is the duty of all employees, volunteers and Board members to take reasonable steps to limit the possibility of corrupt practices. Recognising a potential fraud or act of bribery and being able to report it, is just as important as any prevention measures that are in place.
- 1.5 This policy is in accordance with the Bribery Act 2010 which sets out four key criminal offences:
 - Bribery of another person
 - Accepting a bribe
 - Bribing a public official
 - Failing to prevent bribery

2 NHP Code of Conduct

- 2.1 The NHP Code of Conduct specifies anti-bribery provisions. These are set out in sections on gifts; outside commitments and personal interests; relationships with service users; purchasing goods and services; contractors; and interests.
- 2.2 Any gifts, rewards and benefits that are disproportionately generous or could be seen as an inducement to affect a business decision should be declared.

3 NHP Financial Procedures

- 3.1 The NHP Financial Procedures and related working practice document sets out detailed procedures to prevent the risk of fraud, bribery and corruption.

4 NHP Whistle Blowing policy

- 4.1 All staff are responsible for preventing, detecting and reporting bribery and other forms of corruption. All staff must raise concerns immediately if they believe or suspect a conflict with this policy has occurred. The Whistle Blowing Policy explains the ways in which staff can raise their concerns.

5 Response to allegations of bribery

- 5.1 Unless directly involved in the allegation the Chair of the Board and or the Independent lead member is responsible for allocating a senior manager to investigate allegations of fraud or corruption. This would usually be the Chief Executive Officer
- 5.2 The organisation reserves the right to appoint an external investigator to ensure an independent investigation is undertaken.
- 5.3 Where evidence of fraud or irregularities are found, further action may be taken. This may include:
- Implementing disciplinary procedures
 - Referral to the Police, or other appropriate external agency
 - Seeking legal advice on prosecutions or recovering losses.