



Bribery and Corruption Policy 2022

Name of your organisation: [The Jarrett Foundation](#)

Name of designated Manager: [Dr. Errord Jarrett](#)

Address: [40 Parkside Avenue, Bromley, Kent, BR1 2EJ](#)

Telephone No: [07944561237](#)

Email: info@jarrettfoundation.org

Web Address: www.jarrettfoundation.org

All Jarrett Foundation staff and volunteers must sign or digitally acknowledge that they have received a copy of this policy.

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1. Policy Statement:

It is our policy to conduct all of our business in an honest and ethical manner. We take a zero-tolerance approach to bribery and corruption. We are committed to acting professionally, fairly and with integrity in all our business dealings and relationships wherever we operate and implementing and enforcing effective systems to counter bribery. We will uphold all laws relevant to countering bribery and corruption in all the jurisdictions in which we operate. However, we remain bound by the laws of the UK, including the Bribery Act 2010 (<https://www.legislation.gov.uk/ukpga/2010/23/contents>), in respect of our conduct both at home and abroad.

Bribery and corruption are punishable for individuals by up to ten years' imprisonment and a fine. If we are found to have taken part in corruption, we could face an unlimited fine, be excluded from tendering for public contracts and face damage to our reputation. We therefore take our legal responsibilities very seriously.

2. Definitions and Scope

Bribery is the offering, promising, giving, accepting or soliciting of an advantage as an inducement for action which is illegal or a breach of trust. A bribe is an inducement or reward offered, promised or provided in order to gain any commercial, contractual, regulatory or personal advantage.

Who is covered by this policy?

In this policy, third party means any individual or organisation you come into contact with during the course of your work or volunteering for us, and includes actual and potential clients, customers, suppliers, distributors, business contacts, agents, advisers, and government and public bodies, including their advisors, representatives and officials, politicians and political parties.

This policy applies to all individuals working at all levels and grades, including senior managers, officers, directors, employees (whether permanent, fixed-term or temporary), consultants, contractors, trainees, seconded staff, home workers, casual workers and agency staff, volunteers, interns, agents, sponsors, or any other person associated with us, or any of our subsidiaries or their employees, wherever located (collectively referred to as employees in this policy).

This policy covers:

- Bribes
- Gifts and Hospitality
- Facilitation payments
- Political contributions
- Charitable contributions

Bribes

Employees must not engage in any form of bribery, either directly or through any third party (such as an agent, lobbyist, sponsor or donator). Specifically, employees must not bribe a UK public official or person anywhere within the Kingdom or foreign public official anywhere in the world.

Gifts

Employees must not offer or give any gift or hospitality:

- which could be regarded as illegal or improper, or which violates the recipient's policies; or
- to any public employee or government officials or representatives, or politicians or political parties; or
- which exceeds £40.00 in value for each individual gift or £50.00 in value for each hospitality event (not to exceed a total value of £100.00 in any financial year), unless approved in writing by the employee's manager and or the CEO.

Employees may not accept any gift or hospitality from our business partners if:

- it exceeds £30.00 in value for each individual gift or £40 in value for each hospitality event (not to exceed a total of £90.00 in any financial year), unless approved in writing by the employee's manager; or
- it is in cash; or
- there is any suggestion that a return favour will be expected or implied.

Where a manager's approval is required above, if the manager is below Director level then approval must be sought from an appropriate Director or the CEO. If it is not appropriate to decline the offer of a gift, the gift may be accepted, provided it is then declared to the employee's manager and donated to charity. If gifts are accepted, then they should be documented on a register that is reviewed by the board of directors at the end of each of each calendar year.

We appreciate that the practice of giving business gifts varies between countries and regions and what may be normal and acceptable in one region may not be in another. The test to be applied is whether in all the circumstances the gift or hospitality is reasonable and justifiable. The intention behind the gift should always be considered. Within these parameters, local management may define specific guidelines and policies to reflect local professional and industry standards. Where this policy requires written approval to be given, the Company Secretary shall put in place a process to maintain a register of all such approvals.

Facilitation payments and kickbacks

Facilitation payments are a form of bribery made for the purpose of expediting or facilitating the performance of a public official for a routine governmental action, and not to obtain or retain business or any improper business advantage. Facilitation payments tend to be demanded by low-level officials to obtain a level of service which one would normally be entitled to.

Our strict policy is that facilitation payments must not be paid. We recognise, however, that our employees may be faced with situations where there is a risk to the personal security of an employee or his/her family and where a facilitation payment is unavoidable, in which case the following steps must be taken:

- Keep any amount to the minimum;
- Create a record concerning the payment; and
- Report it to your line manager.

In order to achieve our aim of not making any facilitation payments, each department of the Company will keep a record of all payments made, which must be reported to the Company Secretary, in order to evaluate the business risk and to develop a strategy to minimise such payments in the future.

Political Contributions

We do not make donations, whether in cash or kind, in support of any political parties or candidates, as this can be perceived as an attempt to gain an improper business advantage.

Charitable contributions

Charitable support and donations are acceptable (and indeed are encouraged), whether of in-kind services, knowledge, time, or direct financial contributions. However, employees must be careful to ensure that charitable contributions are not used as a scheme to conceal bribery. We only make charitable donations that are legal and ethical under local laws and practices. No donation must be offered or made without the prior approval of [the compliance manager]. All charitable contributions should be publicly disclosed.

3. Your Responsibilities

You must ensure that you read, understand and comply with this policy.

The prevention, detection and reporting of bribery and other forms of corruption are the responsibility of all those working for us or under our control. All employees are required to avoid any activity that might lead to, or suggest, a breach of this policy.

You must notify your manager

Or

the Company Secretary, your Manager or the Chief Executive Officer (CEO), as soon as possible if you believe or suspect that a conflict with or breach of this policy has occurred, or may occur in the future. Any employee who breaches this policy will face disciplinary action, which could result in dismissal for gross misconduct. We reserve our right to terminate our contractual relationship with any employee if they breach this policy.

4. Record-Keeping

We must keep financial records and have appropriate internal controls in place which will evidence the business reason for making payments to third parties. You must declare and keep a written record of all hospitality or gifts accepted or offered, which will be subject to managerial review. You must ensure all expenses claims relating to hospitality, gifts or expenses incurred to third parties, are submitted in accordance with our expenses policy and specifically record the reason for the expenditure.

All accounts, invoices, memoranda and other documents and records relating to dealings with third parties, such as sponsors, donators, partners, clients, suppliers and business contacts, should be prepared and maintained with strict accuracy and completeness. No accounts must be kept "off-book" to facilitate or conceal improper payments.

5. How to raise a concern

We all have a responsibility to help detect, prevent and report instances of bribery and corruption. You are encouraged to raise concerns about any issue or suspicion of malpractice at the earliest possible stage. If you are unsure whether a particular act constitutes bribery or corruption, or if you have any other queries or concerns, these should be raised with your line Manager

OR

the Company Secretary

OR

The Chief Executive Officer (CEO).

6. What to do if you are a victim of bribery or corruption?

It is important that you tell the Company Secretary or your line Manager as soon as possible if you are offered a bribe by a third party, are asked to make one, suspect that this may happen in the future, or believe that you are a victim of another form of unlawful activity.

7. Protection

Employees who refuse to accept or offer a bribe, or those who raise concerns or report another's wrongdoing, are sometimes worried about possible repercussions.

We aim to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken.

We are committed to ensuring no one suffers any detrimental treatment as a result of refusing to take part in bribery or corruption, or because of reporting in good faith their suspicion, that an actual or potential bribery or other corruption offence has taken place, or may take place in the future. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If you believe that you have suffered any such treatment, you should inform your line Manager immediately. If the matter is not remedied, and you are an employee, you should raise it formally using the company's Grievance Procedure.

8. Training and Communication

Training on this policy forms part of the induction process for all new employees. All existing employees will receive regular, relevant training on how to implement and adhere to this policy. In addition, all employees will be asked to formally accept conformance to this policy on an annual basis. Our zero-tolerance approach to bribery and corruption must be communicated to all suppliers, contractors and business partners, at the outset of our business relationship with them, and as appropriate thereafter.

9. Who is Responsible for the Policy?

The board of directors has overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it.

The Company Secretary has primary and day-to-day responsibility for implementing this policy, and for monitoring its use and effectiveness and dealing with any queries on its interpretation. Management at all levels are responsible for ensuring those reporting to them, are made aware of and understand this policy, and that they are given adequate and regular training on it.

10. Monitoring and Review

The Company Secretary will monitor the effectiveness and review the implementation of this policy, regularly considering its suitability, adequacy and effectiveness. Any improvements identified will be made as soon as possible. Internal control systems and procedures will be subject to regular audits, to provide assurance that they are effective in countering bribery and corruption.

All employees are responsible for the success of this policy and should ensure they use it to disclose any suspected danger or wrongdoing.

Employees are invited to comment on this policy and suggest ways in which it might be improved. Comments, suggestions and queries should be addressed to the Company Secretary.

This policy does not form part of any employee's contract of employment, and it may be amended at any time.

11. What do you do if you have a concern?

It is not the responsibility of the Staff or Trustees working at The Jarrett Foundation to decide whether or not an incident of Bribery and Corruption has taken place, but to act on any concerns through contact with the appropriate authorities so that they can make relevant enquiries and take necessary action to protect the reporting individual concerned.

12. Reporting allegations of bribery and corruption:

INTERNAL REPORTING

Who to contact?

In the first instance you should report your concerns to your line Manager, then:

Name: (internal) Dr Pearl Jarrett

Telephone 07786442616

Email info@jarrettfoundation.org

EXTERNAL REPORTING

Organisation: (external) Serious Fraud Office

Website: (<https://www.sfo.gov.uk/contact-us/reporting-serious-fraud-bribery-corruption/>)

Organisation: (external) Transparency International UK

Website: (<https://www.transparency.org.uk/reporting-corruption>)

Useful links or Websites

- The Bribery Act 2010 (<https://www.legislation.gov.uk/ukpga/2010/23/contents>)
- Anti-Bribery Policy UK Government (<https://www.gov.uk/anti-bribery-policy>)
- The Bribery Act 2010 Guidance (chrome-extension://gphandlahdpffmccakmbngmbjnjjiahp/https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/832011/bribery-act-2010-guidance.pdf)
- The Bribery Act, Quick start Guide (chrome-extension://gphandlahdpffmccakmbngmbjnjjiahp/https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/832012/bribery-act-2010-quick-start-guide.pdf)

CONFIDENTIALITY

Every effort should be made to ensure that confidentiality is maintained for the parties concerned. Information should be shared on a need-to-know basis only, and data kept in a secure place with limited access to designated people.

Disclosure and Barring Service (DBS).

The Jarrett Foundation uses the DBS Check Online Service (<https://dbscheckonline.org.uk/>) to help assess the suitability of staff whose roles brings them into contact with sponsors, donators, financiers, politicians and fundraisers.

Employees working with the finances of The Jarrett Foundation must have an enhanced DBS check, which will include a financial check.

A Disclosure will only be requested after an assessment has indicated that an employee / volunteer, is to be appointed in the relevant position concerned. An employee who refuses to undergo a DBS check will not be permitted to work on any project which involves direct contact with finance, cash, credit and gifts, whether physical or in kind.

Where a Disclosure forms part of the application process, the Jarrett Foundation encourages all applicants to provide details of their criminal record at an early stage in the application process. This should be sent under separate cover to your manager. Failure to reveal information that is directly relevant to the position sought could lead to withdrawal of an offer of employment.

At interview, or in a separate discussion, the Company will ensure that an open and measured discussion takes place on the subject of any offences or other matter that might be relevant to the position. Having a criminal record will not necessarily bar an individual from working with the Jarrett Foundation; the nature of the disclosed conviction and its relevance to the position will be considered. However, disclosure of previous offences of fraud, or embezzlement will result in withdrawal of an offer of employment.

The Directors will undertake to discuss any matter revealed in a Disclosure with the person seeking a position with The Jarrett Foundation before withdrawing a conditional offer of employment.

Signature: _____ **Date:** _____

Full Name and Title: _____

Position Applied or Volunteered For: _____

Support and Training:

We, The Jarrett Foundation, are committed to the provision of Anti Bribery and Corruption training for all our team members.

This policy was adopted on 27th October 2022 This policy will be reviewed on 27th October 2023



Signed:

Dr Pearl Jarrett, CEO, The Jarrett Foundation

Bribery and Corruption Form

RECORD OF CONCERN

Description of Incident (Max 2 sentences):			
Name Individual(s) of Concern:			
Male/Female :		Position	Department
Name Organisation of Concern:			
Date and Time of Concern:			
Your Account of the Concern: (what was said, observed, reported and by whom)			
Additional Information: (your opinion, context of concern/disclosure)			
Your Response: (what did you do/say following the concern)			
Your Name (reporting party):			
Your Signature (reporting party):			
Your Position (reporting party):			
Date and Time of Reporting:			

Internal Use: The Jarrett Foundation

Action:

Investigation:

Review:

Response:

Name:Date:.....

Signature:

Please give this incident report to The Jarrett Foundation via email to info@jarrettfoundation.org. Do not copy it.

You have a duty to follow this up with the organisation to check that it has been received, logged and actioned. Your duty does not end with passing on the report.

Thank you