



Anti-Bribery and Corruption Policy

Part of the BYO Governance and Compliance Policy Suite

Britannia Youth Organisation CIC is a Community Interest Company registered in England and Wales.
Company No. 12515346 | Registered Address: 36 St Joseph's Rd, Ward End, Birmingham, B8 2JU

CONTENTS

1. Introduction	1
2. Purpose & Scope	2
3. Legal Framework	2
4. Definitions	3
5. Prohibited Activities	4
6. Acceptable Conduct	5
7. Third Party Relationships	6
8. Financial Controls	6
9. Training and Awareness	7
10. Reporting and Whistleblowing	8
11. Investigation and Disciplinary Action	9
12. Monitoring and Review	10
13. Responsibilities	10
14. Risk Assessment	11
15. Consequences of Non-Compliance	11
16. Related Policies	11
17. Contact Information	12
18. Commitment Statement	12

Document Details	Policy
Policy Title	Anti-Bribery and Corruption Policy
Version	2.0
Effective Date	7 July 2025
Review Date	7 July 2026
Owner	Governor
Approved By	Hassan Kingsley, Governor
Cross-References	Safeguarding Policy Framework, Anti-Bullying Policy, Code of Conduct Policy, Code of Behaviour Policy, Organisational Values and Inclusion Framework, Recruitment, Selection and Onboarding Policy, Complaints Policy, Whistleblowing Policy

1. Introduction

Britannia Youth Organisation CIC (BYO) is committed to conducting all business activities with integrity, transparency, and in accordance with the highest ethical standards. We have built our reputation among partners, funders, and the communities we serve through our commitment to moral, ethical, and legal practices.

BYO has zero tolerance for bribery and corruption in any form. This Anti-Bribery and Corruption Policy prohibits any form of bribery or corrupt practice involving any stakeholder, including offering, promising, or providing anything of value to improperly influence decisions related to our work with young people and communities.

See Also: Our commitment to ethical conduct is further detailed in our [Code of Conduct Policy](#) and [Code of Behaviour Policy](#).

2. Purpose & Scope

This policy outlines BYO's commitment to preventing bribery and corruption and provides clear guidance on acceptable conduct for all those associated with our organisation.

This policy applies to:

- All employees, directors, and board members
- Volunteers and placement students
- Contractors and consultants
- Partner organisations and third parties acting on behalf of BYO
- Any subsidiary or affiliated organisation

Recruitment Note: All individuals covered by this policy undergo appropriate vetting as detailed in our **Recruitment, Selection and Onboarding Policy** and **Vetting and DBS Policy**.

This policy covers all activities including:

- Funding applications and grant management
- Procurement and purchasing decisions
- Partnership arrangements
- Employment and recruitment decisions
- Service delivery and programme management

3. Legal Framework

This policy is governed by UK anti-corruption and anti-bribery laws, including:

- The Bribery Act 2010
- The Proceeds of Crime Act 2002
- Fraud Act 2006
- Relevant charity law and regulations

4. Definitions

Bribery: Offering, promising, giving, accepting, or soliciting an advantage as an inducement for action which is illegal, unethical, or a breach of trust.

Corruption: The abuse of entrusted power for private gain, including fraud, embezzlement, and other dishonest conduct.

Advantage: Anything of value including money, gifts, hospitality, employment opportunities, business opportunities, or other benefits.

Public Official: Any person holding a legislative, administrative, or judicial office, including employees of public bodies, local authorities, and international organisations.

Staff: All employees of BYO, including full-time, part-time, temporary, and contract workers.
Volunteer: Any individual who freely gives their time to support BYO's activities without payment.

DSL: Designated Safeguarding Lead - the person with lead responsibility for safeguarding across the organisation.

5. Prohibited Activities

5.1 Offering or Giving Bribes

BYO employees, volunteers, and associates are strictly prohibited from:

- Offering, promising, or providing payments, gifts, or other advantages to secure improper business advantage
- Making payments to government officials, funders, or partners to influence decisions
- Providing excessive hospitality or entertainment to improperly influence others
- Making political contributions on behalf of BYO without proper authorisation
- Using BYO funds or resources for personal gain or to benefit family members inappropriately

5.2 Accepting Bribes

BYO employees, volunteers, and associates must not:

- Accept payments, gifts, or other advantages in exchange for improper actions
- Accept benefits that could influence their professional judgment
- Solicit personal benefits from service users, suppliers, or partners
- Accept employment offers or business opportunities that create conflicts of interest

5.3 Facilitation Payments

BYO prohibits facilitation payments - small payments made to secure or expedite routine administrative actions. This includes payments to:

- Speed up permit or licence applications
- Secure meetings with officials
- Expedite standard administrative processes

6. Acceptable Conduct

6.1 Reasonable Hospitality and Gifts

BYO recognises that reasonable hospitality and modest gifts may be part of building legitimate business relationships. The following guidelines apply:

Acceptable:

- Modest gifts of nominal value (under £25) given or received occasionally
- Reasonable hospitality such as business meals where there is a clear business purpose
- Promotional items of minimal value
- Attendance at industry events or conferences where there is clear business benefit

All such activities must:

- Be transparent and properly recorded
- Have a clear business purpose
- Be proportionate and reasonable
- Not create obligation or expectation of reciprocal treatment
- Comply with the recipient organisation's policies

6.2 Charitable Donations and Sponsorship

BYO may make charitable donations and provide sponsorship where:

- There is a clear charitable or community purpose
- The donation is transparent and properly documented
- There is no expectation of business advantage
- The donation complies with all legal requirements
- Proper authorisation has been obtained

7. Third Party Relationships

7.1 Due Diligence

Before engaging third parties who will act on behalf of BYO, appropriate due diligence must be conducted including:

- Verification of business credentials and reputation
- Assessment of anti-bribery and corruption policies
- Understanding of any government or official relationships
- Clear contractual terms regarding anti-bribery expectations

See Also: Our standard recruitment and vetting procedures are outlined in the Recruitment, Selection and Onboarding Policy.

7.2 Third Party Requirements

All third parties acting on behalf of BYO must:

- Comply with this policy and all applicable laws
- Maintain appropriate anti-bribery and corruption policies
- Provide transparency regarding any payments or benefits
- Report any suspected violations immediately
- Allow BYO to monitor compliance

8. Financial Controls

8.1 Record Keeping

All financial transactions must be:

- Accurately recorded in BYO's financial systems
- Supported by appropriate documentation
- Subject to regular review and audit
- Maintained in accordance with legal requirements

8.2 Approval Processes

- All significant expenditure must follow BYO's financial approval processes
- Payments to third parties must be properly authorised and documented
- Any unusual or high-risk payments require additional approval
- Regular financial monitoring and reporting is maintained

9. Training and Awareness

9.1 Training Requirements

All staff and volunteers will receive appropriate training on:

- The requirements of this policy
- How to identify and avoid bribery and corruption risks
- Reporting procedures for suspected violations
- Legal requirements and consequences

9.2 Ongoing Awareness

BYO will maintain awareness through:

- Regular policy updates and communications
- Inclusion in induction programmes
- Periodic refresher training
- Clear guidance and support materials

See Also: Training requirements are integrated with our **Safeguarding Policy Framework** training schedule.

10. Reporting and Whistleblowing

10.1 Reporting Obligations

All staff, volunteers, and associates have a duty to:

- Report suspected bribery or corruption immediately
- Cooperate fully with any investigations
- Maintain confidentiality during investigations
- Not retaliate against those who report concerns in good faith

10.2 Reporting Channels

Concerns should be reported to:

- **Designated Safeguarding Lead (DSL):** Joshua William Hall (07597 874 222)
- **Deputy DSL:** Hassan Alexander Kingsley (07597 874 222)
- **Main Office:** 0121 448 7378

Alternative Reporting: If you feel unable to report through these direct channels, see our **Whistleblowing Policy** for alternative reporting options, including anonymous reporting procedures.
External reporting channels:

- Serious Fraud Office
- Police
- Charity Commission (as appropriate)

10.3 Protection for Whistleblowers

BYO will:

- Protect those who report concerns in good faith from retaliation
- Investigate all reports thoroughly and fairly
- Take appropriate action based on findings
- Maintain confidentiality where possible

See Also: Full whistleblower protections are detailed in our **Whistleblowing Policy**.

11. Investigation and Disciplinary Action

11.1 Investigation Process

All suspected violations will be:

- Investigated promptly and thoroughly
- Conducted by appropriately qualified persons
- Subject to due process and fairness
- Properly documented and recorded

See Also: Where investigations relate to staff conduct, procedures outlined in Managing Allegations about Staff and Volunteers may also apply.

11.2 Disciplinary Measures

Violations of this policy may result in:

- Disciplinary action up to and including dismissal
- Termination of volunteer agreements
- Cancellation of contracts with third parties
- Civil and criminal prosecution where appropriate
- Recovery of losses and damages

See Also: Disciplinary procedures are outlined in our Code of Conduct Policy.

12. Monitoring and Review

12.1 Regular Monitoring

BYO will monitor compliance through:

- Regular internal audits and reviews
- Financial monitoring and analysis
- Third party due diligence reviews
- Incident reporting and analysis

12.2 Policy Review

This policy will be reviewed:

- Annually as a minimum
- Following any significant incidents
- When legislation or regulations change
- Based on experience and best practice developments

13. Responsibilities

13.1 Board of Directors

- Overall responsibility for policy implementation
- Ensuring adequate resources for compliance
- Oversight of significant risks and incidents

13.2 Senior Management

- Day-to-day implementation of the policy
- Ensuring staff training and awareness
- Monitoring compliance and reporting

13.3 All Staff and Volunteers

- Compliance with policy requirements
- Reporting suspected violations
- Participating in training and awareness activities
- Setting a positive example of ethical conduct

See Also: General conduct expectations are outlined in our [Code of Conduct Policy](#) and Code of Behaviour Policy.

14. Risk Assessment

BYO recognises that bribery and corruption risks may arise in various contexts including:

- Funding applications and grant management
- Procurement and supplier relationships
- Partnership development
- International activities (if any)
- Government and regulatory interactions

Regular risk assessments will be conducted to identify and mitigate these risks.

15. Consequences of Non-Compliance

Failure to comply with this policy may result in:

For individuals:

- Disciplinary action
- Dismissal
- Criminal prosecution

For BYO:

- Legal penalties
- Regulatory action
- Reputational damage
- Loss of funding

For society:

- Harm to vulnerable groups
- Reduced public trust
- Unfair resource allocation

16. Related Policies

This policy should be read alongside:

- **Code of Conduct Policy**
- **Code of Behaviour Policy**
- **Whistleblowing Policy**
- **Safeguarding Policy Framework**
- **Recruitment, Selection and Onboarding Policy**
- **Vetting and DBS Policy**
- **Complaints Policy**
- **Managing Allegations about Staff and Volunteers**

17. Contact Information

For guidance on this policy:

- **DSL:** Joshua William Hall (07925 328 728)
- **Deputy DSL:** Hassan Alexander Kingsley (07597 874 222)
- **Main Office:** 0121 448 7378

For reporting concerns:

- Internal: Use contacts above or **Whistleblowing Policy** procedures
- External: Serious Fraud Office, Police, Charity Commission as appropriate

Remember: If you feel unable to report concerns directly, alternative reporting channels are available through our **Whistleblowing Policy**.

18. Commitment Statement

BYO is committed to:

- Conducting all activities with integrity and transparency
- Preventing bribery and corruption in all its forms
- Creating a culture of ethical conduct
- Protecting those who report concerns
- Taking appropriate action against violations

This policy reflects our commitment to the highest ethical standards in serving young people and communities.

This policy is fully supported by the BYO Board and Senior Leadership Team.

Document Control:

- This policy should be read in conjunction with our Code of Conduct Policy and Whistleblowing Policy
- For reporting concerns about conduct, also refer to Managing Allegations about Staff and Volunteers Policy
- All staff and volunteers receive training on this policy as part of their induction

Reviewed by:



Hassan Kingsley

Date: 07/07/2025

Next Review Date: 07/07/2026

This policy forms part of BYO's commitment to safeguarding and should be read alongside our complete Safeguarding Framework.

*Britannia Youth Organisation CIC is a Community Interest Company registered in England and Wales.
Company No. 12515346 | Registered Address: 36 St Joseph's Rd, Ward End, Birmingham, B8 2JU*