

Anti-Bribery & Anti-Fraud Risk Policy 2026

To be read in conjunction with
Conflicts of Interest Policy & Declaration of Interests
and Financial Risk of Fraud statement in appendix

Offences of bribing another person (The Bribery Act 2010)

Section 1 makes it an offence for a person ('P') to offer, promise or give a financial or other advantage to another person in one of two cases: • Case 1 applies where P intends the advantage to bring about the improper performance by another person of a relevant function or activity or to reward such improper performance. • Case 2 applies where P knows or believes that the acceptance of the advantage offered, promised or given in itself constitutes the improper performance of a relevant function or activity.

'Improper performance' is defined at sections 3, 4 and 5. In summary, this means performance which amounts to a breach of an expectation that a person will act in good faith, impartially, or in accordance with a position of trust. The offence applies to bribery relating to any function of a public nature, connected with a business, performed during a person's employment or performed on behalf of a company or another body of person. Therefore, bribery in both the public and private sectors is covered.

For the purpose of deciding whether a function or activity has been performed improperly the test of what is expected is a test of what a reasonable person in the UK would expect in relation to the performance of that function or activity. Where the performance of the function or activity is not subject to UK law (for example, it takes place in a country outside UK jurisdiction) then any local custom or practice must be disregarded – unless permitted or required by the written law applicable to that particular country. Written law means any written constitution, provision made by or under legislation applicable to the country concerned or any judicial decision evidenced in published written sources.

By way of illustration, in order to proceed with a case under section 1 based on an allegation that hospitality was intended as a bribe, the prosecution would need to show that the hospitality was intended to induce conduct that amounts to a breach of an expectation that a person will act in good faith, impartially, or in accordance with a position of trust. This would be judged by what a reasonable person in the UK thought.

So, for example, an invitation to foreign clients to attend a Six Nations match at Twickenham as part of a public relations exercise designed to cement good relations or enhance knowledge in the organisation's field is extremely unlikely to engage section 1 as there is unlikely to be evidence of an intention to induce improper performance of a relevant function.

www.justice.gov.uk/guidance/bribery.htm

It is Impactful Governance - Community Interest Company policy to conduct all of our business in an honest and ethical manner. We take a zero-tolerance approach to bribery and corruption and are committed to acting with integrity, transparency and accountability in all our business dealings and relationships wherever we operate and to implementing and enforcing effective systems to counter bribery and corruption.

1. We will uphold all laws relevant to countering bribery and corruption including the Bribery Act 2010, in respect of our conduct.
2. The Board of Directors have overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it. The Chief Executive has primary and day-to-day responsibility for implementing this policy, monitoring its use and effectiveness and dealing with queries about it.
3. Any employee, consultant or volunteer who breaches this policy will face disciplinary action which could result in dismissal for gross misconduct. Any non-employee who breaches this policy may have their contract terminated with immediate effect.
4. This policy does not form part of any employee's contract of employment and we may amend it at any time. It will be reviewed regularly.

Who must comply with this policy.

This policy applies to all persons working for or with Impactful Governance - Community Interest Company or on Impactful Governance - Community Interest Company behalf in any capacity, including Directors, employees at all levels, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives, business partners, sponsors, or any other person associated with us, wherever located, hereafter collectively referred to as "staff".

What bribery means.

Bribery is offering, promising, giving or accepting any financial or other advantage to induce the recipient or any other person to act improperly in the performance of their functions, or to reward them for acting improperly, or where the recipient would act improperly by accepting the advantage.

An advantage includes money, gifts, loans, fees, hospitality, services, discounts, the award of a contract or anything else of value.

A person acts improperly where they act illegally, unethically, or contrary to an expectation of good faith or impartiality, or where they abuse a position of trust. The improper acts may be in relation to any business or professional activities, public functions, acts in the course of employment, or other activities by or on behalf of any organisation of any kind.

Corruption is the abuse of entrusted power or position for private gain.

All forms of bribery are strictly prohibited. If you are unsure about whether a particular act constitutes bribery, raise it with your Project lead or the Chief Executive.

Specifically, you must not:

- give or offer any payment, gift, hospitality or other benefit in the expectation that a business advantage will be received in return, or to reward any business received;
- accept any offer from a third party that you know or suspect is made with the expectation that we will provide a business advantage for them or anyone else.

You must not threaten or retaliate against another person who has refused to offer or accept a bribe or who has raised concerns about possible bribery or corruption.

Gifts and hospitality.

This policy does not prohibit the giving or accepting of reasonable and appropriate hospitality or business incentives, for legitimate purposes such as building relationships, engaging individuals in our service activities, maintaining our image or reputation, or marketing our products and services (see also Impactful Governance - Community Interest Company's Code of Conduct and Conflicts of a interest Policies).

A gift or hospitality will not be appropriate if it is unduly lavish individuals extravagantly or could be seen as an inducement or reward for any preferential treatment (for example, during contractual negotiations or a tender process).

Gifts must be of an appropriate type and value depending on the circumstances and taking account of the reason for the gift. Gifts must not include cash or cash equivalent (such as vouchers) or be given in secret. Gifts must be given in Impactful Governance – Community Interest Company's name, not your own name.

Promotional gifts of low value such as branded stationery or disability equipment or support may be given to or accepted from existing customers, suppliers and business partners.

Reimbursing a third party's expenses or accepting an offer to reimburse our expenses (for example, the costs of attending a business meeting) would not usually amount to bribery. However, a payment in excess of genuine and reasonable business expenses (such as the cost of an extended hotel stay) is not acceptable.

Record-keeping.

You must declare and keep a written record of all hospitality or gifts given or received (in the Register of Gifts and Hospitality located with the registered office), which will be subject to review. You must also submit all expenses claims relating to hospitality, gifts or payments to third parties in accordance with our expenses policy (with prior granted permission only) and record the reason for expenditure.

All accounts, invoices, and other records relating to dealings with third parties including suppliers and customers should be prepared with strict accuracy and completeness. Accounts must never be kept 'off-book' to facilitate or conceal improper payments.

Procedures & Important Notes

This policy is to be used by Impactful Governance - Community Interest Company to prevent bribery and corruption by or involving its workers, suppliers and partners, and to provide guidance on staff obligations and potential liabilities under the Bribery Act 2010 (“the Act”). It may also assist in meeting the “adequate procedures defence” (see below) to a bribery offence committed by one or several of its staff.

□ About this policy (Part 1)

The Policy Statement sets out the organisation’s commitment to adhere to anti-corruption and bribery laws and to conduct its business in an honest and ethical manner. At the earliest opportunity and before commencing any work for Impactful Governance - Community Interest Company, all staff must complete a **Declaration of Interest form**, declaring and potential, existing or future relationships or contracts that could expose a risk under Bribery or Corruption.

• Who must comply with this policy (Part 2)

Section 7(1) of the Act provides that a relevant commercial organisation is guilty of an offence if a person associated with the organisation bribes another person, intending to obtain or retain business or a business advantage for the organisation. “Associated person” is defined widely in Section 8 of the Act. Clause 2 of the policy is widely drafted to reflect this.

• What bribery means (Part 3)

The essence of bribery is the giving or receiving of an advantage in connection with some improper performance of functions.

• Gifts and hospitality (Part 4)

The provision of gifts and hospitality are relatively common when doing business and are not in themselves unlawful. Neither is the reimbursement of genuine business expenses incurred by a third party (such as travel and accommodation). However, these may amount to bribery if given or received with the intention of improperly influencing business or regulatory decisions. It is therefore important that Impactful Governance – Community Interest Company clearly sets out our policy on what is and what is not acceptable, considering the nature of our work, standard practice within our field of work and the jurisdictions in which we operate. We carry out an appropriate risk assessment and due diligence exercise to determine the risks to our organisation.

□ Record keeping (Part 5)

A written log of gifts or donations is kept in the registered office.

□ **How to raise a concern (Part 6)**

For the purpose of good relations, it is always best to raise the concern directly with the person relating to the concern you have. This may not always be possible due to the nature or sensitivity of the issue or concern. To be effective, the policy encourages workers to raise concerns and report violations as early as possible. This is particularly important since the employer will be liable for the worker's actions unless it can meet the "adequate procedures" defence. The following conditions should be followed in sequence:

- A. Where possible the issue needs to be raised and dealt with directly by the person involved in the concern.
- B. If a concern cannot be raised directly with the person involved, the person with a concern must inform their immediate Line Manager with details of their concern.
- C. If the matter relates to the immediate Line Manager, then their Line Manager must be informed to escalate the matter for resolution.
- D. If the matter cannot be raised under these conditions, the Whistleblowing Policy comes into effect as a last resort.

If you are offered a bribe, or are asked to make one, or if you suspect that any bribery, corruption or other breach of this policy has occurred or may occur, you must notify your Project Lead or the Chief Executive or report it in accordance with our Whistleblowing Policy as soon as possible.

Individuals who refuse to accept or offer a bribe, or 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.

Appendix A

Responding to fraud risks

The organisation's response to fraud risk is customised to the risks it faces.

This includes:

1. developing Fraud Policy Statement
2. a Fraud Risk Strategy
3. a Fraud Response Plan

We are developing and promoting an anti-fraud culture through this clear statement of commitment to ethical behaviour to promote awareness of fraud.

An important part of ensuring we have a balanced and trustworthy staff is through recruitment screening, training and maintaining good staff morale.

Responsibility for the overall and specific management of fraud risk is initially directed to the Finance Director so that these processes are integrated into management through the Board of Directors.

We are establishing cost-effective internal systems of control to prevent and detect fraud.

Developing the skills and expertise to manage fraud risk effectively and to respond to fraud effectively when it arises is part of this process and the Finance Director is currently studying the AAT qualification to consider the potential risks of fraud

Staff and members of the public should report any suspicions of fraud, in confidence to the Chief Executive in the first instance.

We will respond quickly and effectively to any proven fraud when it arises.

The Directors are establishing systems for investigations into allegations of fraud.

Using the government's Counter Fraud Function and/or Internal Audit to advise on fraud risk and drawing on their experience to strengthen control.

We will take appropriate action (criminal, disciplinary) against fraudsters and seeking to recover losses.

We will continuously evaluate the effectiveness of anti-fraud measures in reducing fraud by reviewing our Policies and Procedures at regular intervals.

We work with stakeholders to tackle fraud through intelligence sharing, joint investigations and also notify when allegations of fraud are raised, to protect the integrity and honesty of our projects and joint reputations.

Having a programme of fraud risk assessment, and fraud measurement.

Having systems to report to the centre all instances and values of prevented and detected fraud from across the organisation.

Having metrics with a financial impact based upon prevented and/or detected fraud against a baseline.

Have a programme to test for, and measure, previously undetected and unreported fraud.

It is good practice to measure the effectiveness of actions taken to reduce the risk of fraud. Assurances about these measures can be obtained from Internal Audit fraud loss measurement exercises, stewardship reporting, monitoring, or from other review bodies.

Date of last review	September 2026
Date of next review	October 2027
Date it was first implemented	October 2017
Author(s)	Directors
Audience	All Directors, Consultants, Employees, Volunteers and Stakeholders.
Other relevant policies and/or procedures	Conflicts of Interest Policy, Data Retention, Whistle Blowing policy, Disciplinary policy.
Where it is saved	www.ig-cic.org.uk