

## **Bribery and Corruption Policy**

This policy sets out the responsibilities of the Harrow Town Centre BID and those who work for the organisation regarding observing and upholding our zero-tolerance position to bribery and corruption. It also provides a source of information and guidance for those working for the Harrow Town Centre BID and helps them recognise and deal with bribery and corruption issues, as well as understand their responsibilities.

### **Policy statement**

Harrow Town Centre BID is committed to conducting business in an ethical and honest manner and is committed to implementing and enforcing systems that ensure bribery is prevented. Harrow Town Centre BID has a zero-tolerance for bribery and corrupt activities. It is committed to acting professionally, fairly, and with integrity in all business dealings and relationships, wherever in the country it operates.

Harrow Town Centre BID will constantly uphold all laws relating to anti-bribery and corruption and is bound by the laws of the UK, including the Bribery Act 2010, regarding its conduct. Harrow Town Centre BID recognises that bribery and corruption are punishable by up to ten years imprisonment and a fine. If our company is discovered to have taken part in corrupt activities, we may be subjected to an unlimited fine, be excluded from tendering for public contracts, and face serious reputational damage. It is with this in mind that Harrow Town Centre BID commits to preventing bribery and corruption in its' business and takes its' legal responsibilities seriously.

### **Who is covered by the policy?**

This policy applies to all employees (whether temporary, fixed-term, or permanent), consultants, contractors, trainees, seconded staff, home workers, casual workers, agency staff, volunteers, interns, agents, sponsors, third parties, or any other person or persons associated with the Harrow Town Centre BID.

### **Definition of bribery**

Bribery refers to the act of offering, giving, promising, asking, agreeing, receiving, accepting, or soliciting something of value or of an advantage so to induce or influence an action or decision. A bribe refers to any inducement, reward, or object/item of value offered to another individual in order to gain commercial, contractual, regulatory, or personal advantage. Bribery is not limited to the act of offering a bribe. If an individual is on the receiving end of a bribe and they accept it, they are also breaking the law.

Bribery is illegal. Employees must not engage in any form of bribery, whether it be directly, passively, or through a third party (such as an agent or distributor). They must not accept bribes in any degree and if they are uncertain about whether something is a bribe or a gift or act of hospitality, they must seek further advice from the BID Manager / BID Chair.

## **What is and what is NOT acceptable**

### **Gifts and hospitality**

The organisation accepts normal and appropriate gestures of hospitality and goodwill (whether given to/received from third parties) so long as the giving or receiving of gifts meets the following requirements:

- It is not made with the intention of influencing the party to whom it is being given, to obtain or reward the retention of a business or a business advantage, or as an explicit or implicit exchange for favours or benefits.
- It is not made with the suggestion that a return favour is expected.
- It is in compliance with legislation.
- It is given in the name of the company, not in an individual's name.
- It does not include cash or a cash equivalent (*e.g.* a voucher or gift certificate).
- It is appropriate for the circumstances (*e.g.* giving small gifts around Christmas or as a small thank you to a company for helping with a large project upon completion).
- It is of an appropriate type and value and given at an appropriate time, taking into account the reason for the gift.
- It is given openly, not secretly.
- It is not selectively given to a key, influential person, clearly with the intention of directly influencing them.
- It is not above a certain excessive value, as pre-determined by the Finance and Governance Group.
- It is not an offer to, or accepted from, a government or corporate official or representative or politician or political party, without the prior approval of the Finance and Governance Group.
- Where it is inappropriate to decline the offer of a gift (i.e. when meeting with an individual of a certain religion/culture who may take offence), the gift may be accepted so long as it is declared to the BID Manager / BID Chair, who will assess the circumstances.
- Harrow Town Centre BID recognises that the practice of giving and receiving business gifts varies between countries, regions, cultures, and religions, so definitions of what is acceptable and not acceptable will inevitably differ for each.
- As good practice, gifts given and received should always be disclosed to the Chair. Gifts from suppliers should always be disclosed and documented on the gifts and hospitality register.
- The intention behind a gift being given/received should always be considered. If there is any uncertainty, the advice of the Chair should be sought.

### **Facilitation Payments and kickbacks.**

Harrow Town Centre BID does not accept and will not make any form of facilitation payments of any nature. It recognises that facilitation payments are a form of bribery that involves expediting or facilitating the performance of a public or corporate official for a routine action.

Harrow Town Centre BID does not allow kickbacks to be made or accepted. It recognises that kickbacks are typically made in exchange for a business favour or advantage. Harrow Town Centre BID recognises that, despite a strict policy on facilitation payments and kickbacks, employees may face a situation where avoiding a facilitation payment or kickback may be difficult. Under these circumstances, the following steps must be taken:

1. Keep any amount to the minimum.
2. Ask for a receipt, detailing the amount and reason for the payment.
3. Create a record concerning the payment.
4. Report this incident to the Chair.

### **Political Contributions**

Harrow Town Centre BID will not make donations, whether in cash, kind, or by any other means, to support any political parties or candidates. It recognises this may be perceived as an attempt to gain an improper business advantage.

## **Charitable Contributions**

Harrow Town Centre BID accepts (and indeed encourages) the act of donating to charities – whether through services, knowledge, time, or direct financial contributions (cash or otherwise) – and agrees to disclose all charitable contributions it makes.

Employees must be careful to ensure that charitable contributions are not used to facilitate and conceal acts of bribery. Harrow Town Centre BID will ensure that all charitable donations made are legal and ethical under local laws and practices, and that donations are not offered/made without the approval of the Chair.

## **Employee Responsibilities**

As an employee of Harrow Town Centre BID you must ensure that you comply with the information contained within this policy, and with any training or other anti-bribery and corruption information you are given.

All employees and those under our control are equally responsible for the prevention, detection, and reporting of bribery and other forms of corruption. They are required to avoid any activities that could lead to, or imply, a breach of this anti-bribery policy.

If you have reason to believe or suspect that an instance of bribery or corruption has occurred or will occur in the future that breaches this policy, you must notify your line manager.

If any employee breaches this policy, they will face disciplinary action and could face dismissal for gross misconduct. [The organisation has the right to terminate a contractual relationship with an employee if they breach this anti-bribery policy.

## **What happens if I need to raise a concern?**

### **How to raise a concern**

If you suspect that there is an instance of bribery or corrupt activities occurring in relation to the Harrow Town Centre BID, you are encouraged to raise your concerns at as early a stage as possible. If you're uncertain about whether a certain action or behaviour can be considered bribery or corruption, you should speak to the BID Manager / BID Chair.

Harrow Town Centre BID employs 'whistleblowing' procedures so employees can vocalise their concerns swiftly and confidentially.

### **What to do if you are a victim of bribery or corruption**

You must tell the BID Manager / BID Chair as soon as possible if you are offered a bribe by anyone, if you are asked to make one, if you suspect that you may be bribed or asked to make a bribe in the near future, or if you have reason to believe that you are a victim of another corrupt activity.

### **Protection**

If you refuse to accept or offer a bribe or you report a concern relating to potential act(s) of bribery or corruption, Harrow Town Centre BID understands that you may feel worried about potential repercussions. Harrow Town Centre BID will support anyone who raises concerns in good faith under this policy, even if investigation finds that they were mistaken.

Harrow Town Centre BID will ensure that no one suffers any detrimental treatment as a result of refusing to accept or offer a bribe or other corrupt activities or because they reported a concern relating to potential act(s) of bribery or corruption. Detrimental treatment refers to dismissal, disciplinary action, treats, or unfavourable treatment in relation to the concern the individual raised.

If you have reason to believe you've been subjected to unjust treatment as a result of a concern or refusal to accept a bribe, you should inform the BID Manager / BID Chair immediately.

### **Record keeping**

Harrow Town Centre BID will keep detailed and accurate financial records and will have appropriate internal controls in place to act as evidence for all payments made. Harrow Town Centre BID will declare and keep a written record of the amount and reason for hospitality or gifts accepted and given and understand that gifts and acts of hospitality are subject to review.

### **Monitoring and reviewing**

The BID Manager is responsible for monitoring the effectiveness of this policy and will review the implementation of it on a regular basis. They will assess its suitability, adequacy, and effectiveness.

Internal control systems and procedures designed to prevent bribery and corruption are subject to regular audits to ensure that they are effective in practice.