



The Parish of
All Saints with St Margaret
Upper Norwood



Anti-Bribery Policy

The PCC of All Saints with St Margaret, Upper Norwood, recognises their duty to ensure that the charity is compliant with the law.

The Trustees consider that the risk that the charity will contravene the Bribery Act 2010 is very small. For the avoidance of doubt, however, the PCC expressly prohibits anyone associated with the charity (including Trustees, permanent and temporary staff, or agents acting on its behalf) from offering, giving, soliciting or accepting any bribe (of whatever nature) in order to advantage in any way the PCC, themselves or persons/businesses connected with either.

Trustees require that any suspicion of activities of this nature to be brought to the attention, as appropriate, of the Churchwardens, or the Vicar. Evidence of such activity will be used in disciplinary misconduct action against the staff member, or will result in the trustee or member of staff being required to resign.

The giving or receiving of appropriate hospitality, or small gifts by way of 'thank you' are not prohibited by this policy if reasonable in context and not initiated with any intention to improperly influence any decision or process, or provide reward for doing so.

For the purposes of transparency, the Churchwardens will maintain a register of hospitality and gifts, given or received, with an individual value of £50 or more. Trustees, staff and other agents acting on behalf of the PCC are requested to notify the Parish Administrator of any gifts or hospitality received or given in excess of this amount, in connection with their activities with the Trust. The Parish

Office Administrator will bring any new entries on the register to the attention of the members of the Standing Committee.

The PCC will review this policy and its associated procedures regularly, and in the event of any developments which might indicate risk of contravention of the Act. Copies of this policy must be provided to all trustees and staff.