

1.0 General statement

1.1 The Bribery Act 2010 came into force in England and Wales on 1 July 2011. The legislation prohibits the offering, the giving, the solicitation or the acceptance of any bribe, whether as cash or any other kind of inducement. Children in Wales is opposed to any form of bribery and is committed to maintaining the highest possible ethical standards in all its activities.

2.0 Principles

2.1 Children in Wales prohibits the offering, the giving, the solicitation or the acceptance of any bribe, whether as cash or any other kind of inducement. A bribe is an inducement or reward offered, promised or provided in order to gain any commercial, contracted, regulatory, monetary, financial or other personal advantage:

- To or from any person or company, whether a public official or public body, or a private person or company, wherever they are situated; or
- by any individual employee, agent or other person or body acting on behalf of Children in Wales;
- In order to gain any commercial, contractual or regulatory advantage for Children in Wales, or
- in order to gain any personal advantage, pecuniary (related to money or finance) or otherwise, for the individual or anyone connected with the individual.

2.2 Any donations made in good faith should be publicly documented.

2.3 Any breach of this policy will result in disciplinary action.

3.0 Scope of Policy

3.1 This policy applies to Children in Wales, its staff, trustees and any other agency or individual working on behalf of or representing the organisation.

3.2 This policy is not intended to prohibit the following practices provided they are customary in a particular market, are appropriate and are properly recorded:

- normal and appropriate hospitality, as set out in Children in Wales' Gifts and Hospitality Policy
- the giving of a ceremonial gift on a festival or at another special time, as set out in the Gifts and Hospitality Policy

- payment for specific services, authorised and recorded by Children in Wales
- the use of any recognised fast-track process which is available to all on a payment of a fee
- the offer of resources to assist a person or body to make a decision more efficiently provided that they are supplied for that purpose only

4.0 Guidance

- 4.1 If an individual member of staff has any doubt as to whether a potential act constitutes bribery, the matter should be referred to the individual's line manager or to the Corporate Management Team.
- 4.2 The prevention, detection and reporting of bribery is the responsibility of all employees of Children in Wales. If and when an instance of bribery is identified, remedial steps must be taken immediately, including the reporting of the incident (or suspected incident) of bribery in accordance with Children in Wales' Whistleblowing (Public Disclosure) Policy.
- 4.3 This policy should be read in conjunction with:
 - Gifts and Hospitality Policy
 - Whistleblowing (Public Disclosure) Policy