



Anti-Bribery Policy

Navy Cadet Force

NB The title Navy Cadet Force has been shortened throughout this document to (NCF) purely to reduce costs of printing, by saving ink and paper, and thus be more environmentally friendly. This document is for internal use only.

Introduction

This NCF, is committed to implementing and enforcing effective systems to counter bribery. Therefore, it is the NCF's policy to conduct all aspects of its operations in an honest and ethical manner at all times.

This policy applies to all individuals involved in the NCF, whether in uniform or not, and whether an adult or a cadet, including anyone providing services to the NCF such as consultants, or contractors.

Policy Aim

The aim of this policy is to help the NCF act in accordance with the Bribery Act 2010, maintain the highest possible standards of business practice, and advise individuals of the NCF's 'zero-tolerance' to bribery.

The Law

Under UK law (UK Bribery Act 2010), bribery and corruption is punishable for individuals by up to ten years imprisonment. If the NCF is found to have taken part in the corruption or lacks adequate procedures to prevent Bribery, it could face an unlimited fine.

Policy Statement

This policy applies to all volunteers and cadets with the NCF, and any contractors, consultants or other persons acting under or on behalf of the NCF.

The NCF will not:

- Make contributions of any kind with the purpose of gaining any commercial advantage.
- Provide gifts or hospitality with the intention of persuading anyone to act improperly, or to influence a public official in the performance of their duties.
- Make, or accept, "kickbacks" of any kind.

The NCF will:

- Keep appropriate internal records that will evidence the reason for making any payments to third parties.
- Encourage all staff and volunteers to raise concerns about any issue or suspicion of malpractice at the earliest possible stage.
- See that anyone raising a concern about bribery will not suffer any detriment as a result, even if they turn out to be mistaken.

Staff Responsibility

All staff (whether uniformed or not) must not:

- Accept any financial or other reward from any person in return for providing some favour.
- Request a financial or other reward from any person in return for providing some favour.
- Offer any financial or other reward from any person in return for providing some favour.

Gifts and Hospitality

This policy does not prohibit giving and receiving promotional gifts of low value, or normal and appropriate hospitality.

Receiving gifts:

- Receiving promotional gifts of low value is normal and appropriate, however, gifts with a value exceeding £25.00 may not be accepted without approval. Any gift offered and then refused because of its value, must be reported to the Trustees. This policy does not preclude the receipt of genuine donations or grants to the NCF.

Offering gifts:

- Business gifts are primarily aimed at thanking customers and suppliers for their custom and loyalty, only authorised gifts may be given.

Receiving Hospitality:

The acceptance of corporate hospitality must be transparent; all invitations must be reported to the XO before a member of staff or volunteer in whatever capacity accepts any invitation.

The following areas are exempt while attending conferences, seminars, sponsored by third parties.

- business and travel expenses incurred
- normal business lunches and meals

Offering gifts and hospitality:

- NCF hospitality is primarily aimed at thanking customers and suppliers for their custom and loyalty. All hospitality events must have approval.

Donations to organisations:

- No donations should be made to charities, political parties or other organisations without approval.

Non Compliance

Staff

Failing to observe NCF policy may lead to disciplinary action in accordance with the NCF's Discipline Policy.

Visitors

In the event of a breach of the policy by other organisations, or individuals, the NCF will take appropriate action.

Monitoring Policy

The policy will be monitored on an on-going basis to ensure that it addresses issues effectively.

The following will be monitored:

- That all individuals volunteering with the NCF are advised of the policy.
- Assessment of any reported incident or related occurrence.

Monitoring of the policy is essential to assess how effective the NCF has been to establish control of its obligations.

Definitions

Bribe is a financial or other advantage offered or given to anyone to persuade them to or reward them for performing their duties improperly, or, with the intention of influencing them in the performance of their duties.

Hospitality is the practice of being hospitable, this includes the reception and entertainment of guests / visitors.

Kickbacks or facilitation payments are typically small payments made in return for a business favor or advantage.

Reviewing Policy

This policy will be reviewed and, if necessary, revised in the light of legislative or organisational changes. Improvements will be made by learning from experience and the use of an established annual review.

Policy Amendments

Should any amendments, revisions, or updates be made to this policy it is the responsibility of the XO to see that all relevant volunteers receive notice. Written notice and/or training should be considered.

The Responsibility of this Policy falls to the Colonel of the Navy Cadet Force.

A handwritten signature in black ink, appearing to read 'T. Fitzgerald', with a large, sweeping flourish extending to the right.

Signed:

Date: January 2023

Print: Colonel Terry Fitzgerald

This Policy has been approved for distribution by the Chairman of the Navy Cadet Force.

A handwritten signature in black ink, appearing to read 'Luke Giles', with a large, sweeping flourish extending to the right.

Signed:

Date: January 2023

Print: Luke Giles