

Anti-Bribery and Anti-Corruption Policy

1. Introduction

- 1.1 The Bribery Act 2010 came into force on 1st July 2011 and is generally viewed as the most robust and toughest anti-corruption legislation in the world. Bribery and corruption harms the societies in which these acts are committed and prevents economic growth and development. It is an important issue and not one that only affects large transnational corporations, it affects us as well.
- 1.2 Ensuring that Lincoln South Methodist Circuit (LSMC) operates free from bribery and corruption is not just a cultural commitment on the behalf of LSMC: it is a moral, social and legal requirement of all paid staff, presbyters, deacons, circuit stewards and volunteers working for LSMC.
- 1.3 It is important that everyone involved with working for LSMC reads and understands this policy. It is to be read in conjunction with LSMC's Gifts and Hospitality Policy and Whistle-blowing policy. If you have any queries whatsoever regarding this policy or the implications of the Bribery Act 2010, please contact your Minister or Superintendent Minister.
- 1.4 The Circuit leadership attach the utmost importance to this policy and will apply a "zero tolerance" approach to acts of bribery or corruption. Breaches of this policy are likely to be serious and result in immediate disciplinary action.

2. What is bribery and corruption?

- 2.1 Bribery and corruption has a range of definitions in law, but the fundamental principles apply universally. Essentially, the Bribery Act 2010 has created the following principle offences:
 - 2.1.1 **Making bribes** - it is an offence to offer or give a financial or other advantage with the intention of inducing that person to perform a relevant function or activity improperly or to reward that person for doing so
 - 2.1.2 **Receiving bribes** - it is an offence to receive a financial or other advantage intending that a relevant function or activity should be performed improperly as a result
 - 2.1.3 **Bribery of foreign public officials** – it is an offence to offer or give a financial advantage to a foreign public official with the intention of influencing the official and obtaining or retaining business, where the official is neither permitted nor required by written law to be so influenced.
- 2.2 With respect to LSMC, only the offences set out in paragraphs 2.1.1 and 2.1.2 are likely to be relevant

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2.3 Essentially, acts of bribery or corruption are designed to influence an individual in the performance of their duty and incline them to act dishonestly. The person being bribed is generally someone who will be able to obtain, retain or direct business.

3. Examples of bribes

3.1 Bribes can take on many different shapes and forms, but typically they involve corrupt intent. There will usually be a '*quid pro quo*' – i.e. where both parties benefit. We hope that the chances of a presbyter, deacon, paid lay staff member or volunteer engaging in corrupt conduct is very low, but nonetheless it is still extremely important that everyone is vigilant and alive to the possibility of bribery. Bribery in our circuit may happen for example where:

- a volunteer or member of staff receives something of value, whether financial or otherwise, from someone to whom work is subsequently directed.

3.2 Importantly, individuals do not have to personally gain for bribery or corruption to have taken place.

3.3 Opportunities for paid work can sometimes arise within the context of our LSMC functions where external professional expertise is required (e.g. solicitors, accountants, land agents, trades people etc.) It is advisable that 2 or 3 quotes are sought before making a choice where the work is of significant value. It is possible that LSMC volunteers or Circuit Stewards may be considered amongst the choices as long as it is made clear that this role is completely separate from their role within LSMC. Family members may also be considered provided, for the sake of transparency, that their relationship is disclosed and that two independent trustees validate their selection

3.4 A review of service providers should take place at least every two years to avoid complacency and enhance transparency.

4. Penalties for offences

4.1 Penalties for individuals engaging on bribery or corruption can be severe and can include up to 10 years imprisonment. Organisations like ours can face unlimited fines if one of our staff engages in bribery or corrupt activity. It is therefore in your interests, as well as ours, that you act with propriety, integrity and professionalism at all times.

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5. Your obligations

- 5.1 Assessing risk and open and transparent communication lies at the very core of the success or failure of this policy. Your obligations are to:
 - 5.1.1 ensure that you understand and are familiar with this policy, LSMC’s Hospitality and Gifts policy and our operations generally;
 - 5.1.2 ensure that any offer of reward, advantage or value received by you is communicated immediately to your Minister or Superintendent Minister;
 - 5.1.3 ensure at all times that you are familiar with any professional rules that bind you and that you remain independent, maintain your integrity and free from corruption;
 - 5.1.4 ensure that your record keeping is up-to-date and clear and that expenses are supported by evidence and claimed back properly in accordance with LSMC’s policy; and
 - 5.1.5 immediately report any suspicious behaviour by colleagues, church members or any other individual or organisation associated with LSMC to your Superintendent Minister.

6. How to raise a concern

- 6.1 As individuals who work on behalf of LSMC, we all have a responsibility to help detect, prevent and report instances not only of bribery, but also of any other suspicious activity or wrongdoing. We are absolutely committed to ensuring that all of us have a safe, reliable, and confidential way of reporting any suspicious activity. We want each and every one to know how they can “speak up”.
- 6.2 If you have any concerns whatsoever and no matter how unimportant or trivial or misguided they may seem, you should contact your Superintendent Minister immediately. You should familiarise yourself with and, if necessary, use LSMC’s Whistle-blowing policy.

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