



# EYNSFORD VILLAGE HALL – ANTI-BRIBERY & CORRUPTION POLICY

## 1) Preamble

Eynsford Village Hall ('EVH') is committed to conducting business in an ethical and honest manner and is committed to implementing and enforcing systems that ensure all forms of bribery, corruption and fraud are prevented.

EVH has zero tolerance for bribery and corrupt activities, and are committed to acting professionally, fairly and with integrity in all business dealings and relationships we build with all users, contractors, trustees and members of the public who use the hall.

EVH will constantly uphold the laws relating to anti-bribery and corruption, and are bound by the laws of the UK, including the Bribery Act 2010, in regards to conduct.

## 2) Who is covered by this policy?

This policy applies to all trustees, employees, contractors and officials of EVH (including third parties). All persons must ensure that they do not become involved in any way in the payment or receipt of bribes.

## 3) 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 obtain commercial, contractual, regulatory or personal advantage.

This includes, but is not limited to, gifts and excessive or inappropriate entertainment, hospitality, travel and accommodation expenses, payments, and favours such as making payments or promises.

## 4) Individuals' responsibilities

All individuals described above in Paragraph 2, must ensure that they read, understand and comply with this policy.

The prevention, detection and reporting of bribery and other forms of corruption are the responsibility of all individuals and all are required to avoid any activity that might lead to, or suggest, a breach of this policy.



If any individual has reason to believe or suspect that an instance of bribery or corruption has occurred or will occur in the future that breaches this policy, they must advise the EVH Secretary or Chairman both verbally and in writing.

#### 5) How to raise a concern

Individuals are encouraged to raise concerns about any issue or suspicion of malpractice at the earliest possible stage. If they are unsure as to whether a certain action or behaviour can be considered bribery or corruption, they should speak to the EVH Secretary.

#### 6) What to do if victim of bribery or corruption

An individual must tell the EVH Secretary as soon as possible, and follow this up in writing, if they are offered a bribe by a third party, are asked to make one, suspect that this may happen in the future, or if they have reason to believe that they are a victim of another corrupt activity. When so notified, the Secretary must inform the Trustees and if required the Trustees should instigate an investigation into the incident.

This investigation should deal with the matter promptly, record any evidence received and work with any external agencies, such as the Police, to ensure that all issues are properly investigated and reported on.

#### 7) Monitoring and reviewing

The trustees have overall responsibility for ensuring this policy complies with all legal and ethical obligations.

The EVH Secretary has primary and day-to-day responsibility for implementing the policy and for monitoring its use and effectiveness and dealing with any queries and interpretation. Any need for improvements will be made as expeditiously as possible.

#### 8) Summary

EVH is committed to remove and combat any inappropriate behaviour immediately and will not tolerate such behaviour in any form from any trustees, employees, contractors or officials of EVH.

This policy will be reviewed annually at the AGM for Eynsford Village Hall.

Last Reviewed: 26<sup>th</sup> September 2024 AGM

Next Review: 2025 AGM