

Anti Bribery Policy

Introduction

The Charity is committed to implementing and enforcing effective systems to counter bribery, it is therefore the Charity's policy to conduct all aspects of its business in an honest and ethical manner at all times.

Policy

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

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

This policy applies to all personnel employed by the Charity, volunteers, and any contractors, consultants or other persons acting under or on behalf of the Charity.

The Charity 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.

Charity Responsibility

The Charity will:

- Keep appropriate internal records that will evidence the business reason for making any payments to third parties.
- Encourage employees 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.

Employee and Volunteers Responsibility:

Employees and Volunteers 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.

Non Compliance

All employees have a role to play in enforcing the policy and are required to deal with any observed or reported breaches. Should employees feel apprehensive about their own safety in regard to addressing any breach, they should seek senior management support.

Any member of staff refusing to observe the policy will be liable to disciplinary action in accordance with the Charity's Disciplinary Policy up to and including dismissal.

Implementation of the Policy

Overall responsibility for policy implementation and review rests with the Charity's Trustees. However, all staff are required to adhere to and support the implementation of the policy. The Charity will inform all existing employees and volunteers about this policy and their role in the implementation of the policy. They will also give all new employees and volunteers notice of the policy on induction to the Charity.

Monitoring Policy

The policy will be monitored on an on-going basis, monitoring of the policy is essential to assess how effective the Charity has been.

Reviewing Policy

This policy will be reviewed and, if necessary, revised in the light of legislative or codes of practice and organisational changes. Improvements will be made to the management by learning from experience and the use of established reviews.

Policy Amendments

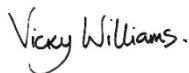
Should any amendments, revisions, or updates be made to this policy it is the responsibility of the Charity's Trustees to see that all relevant employees receive notice. Written notice and/or training will be considered.

Additional Information

If you require any additional information or clarification regarding this policy, please contact the Challenge Wales office. In the unlikely event where you are unhappy with any decision made, you should use the Charity's formal Grievance Procedure.

To the extent that the requirements of this policy reflect statutory provisions, they will alter automatically when and if those requirements are changed.

Signed on behalf of the Board of trustees



Vicky Williams, Trustee
Date: 17.02.2023



Helen Phillips – Chair of Board of Trustees
Date: 17.2.2023



Challenge Wales is a company limited by guarantee Reg. No. 05342397.

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