

Anti-bribery

Legislation

The Bribery Act 2010 creates a new offence which can be committed by an organisation which fails to prevent persons associated with them from committing bribery on its behalf but only if that person performs services for you in business. It is unlikely that the organisation will be liable for the actions of someone who simply supplies goods to you. There is full defence if it can be shown that there are adequate procedures and risk assessments in place to prevent bribery.

We have adopted this policy to ensure that we have adequate procedures in place that are proportionate to the bribery risks we face.

It is our policy to conduct all of our business in an honest and ethical manner. We take a zero-tolerance approach to bribery and corruption and are committed to acting professionally, fairly and with integrity in all our dealings wherever we operate. We are also committed to implementing and enforcing effective systems to counter bribery.

What is a bribe?

A 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;
- to any public official with the intention of influencing the official in the performance of his/her duties.

Gifts and hospitality

A 'gift' is defined as any item, cash, goods, or any service which is offered for personal benefit at a cost, or no cost, that is less than its commercial value.

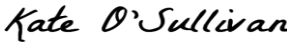

You should consider the following if a gift is offered:

- Whether it is appropriate to accept it;
- Decline gifts unless to do so would cause serious embarrassment; and
- Discuss the position with the manager or Community Association Manager if the gift clearly has a value in excess of £25

Parents or other service users may wish to thank staff for looking after their child / young person or other staff with Christmas gifts or gifts when the child / other service user leaves the setting. This is perfectly understandable. Each staff member is responsible for deciding if this gift is appropriate to accept and if it should be shared with the wider team. If in any doubt discuss this with the manager.

The GGCA will not accept gifts from service providers. This may be deemed as a bribe to maintain a contract. The GGCA will remain transparent and open at all times.

This policy was adopted on 13.10.2025 and will be reviewed on or before 13.10.2026

Name and Position	Signed	Date
Kate O'Sullivan Community Association Manager		13.10.2025
Olive Frances Vice Chair of Trustees		13.10.2025