



Anti-Bribery Policy

Anti-Bribery Policy

Document Control

Official

Responsible Officer: Chief Executive Officer

Date for next review: January 2022

Version history

Version	Issue date	Author/editor	Responsible Officer Approval Date	Summary of changes
1.0	January 2021	Emily Weir, HR Business Partner		First issue.

Related documents

Document	File Location

Anti-Bribery Policy

1. Overview

- 1.1. Policy statement
- 1.2. Purpose
- 1.3. Scope

2. The Law

- 2.1. Bribery

3. Facilitation Payment and Kickbacks

4. Gifts, Entertainment and Hospitality

- 4.1. Considerations
- 4.2. Gifts
- 4.3. Hospitality

5. Responsibilities

6. Record Keeping

7. Raising a Concern

- 7.1. Protection

1.1 Policy Statement

BlueLight Commercial is committed to ethical standards of business conduct and adopts a zero-tolerance approach to bribery and corruption. BlueLight Commercial will uphold all laws relevant to countering bribery and corruption, including but not limited to, the Bribery Act 2010.

1.2 Purpose

This policy aims to support BlueLight Commercial in acting in accordance with the Bribery Act 2010. It also aims to maintain the highest possible standards of business practice and advise individuals of BlueLight Commercial's 'zero-tolerance' to bribery.

1.3 Scope

This policy applies to

- All employees of BlueLight Commercial
- All secondees into BlueLight Commercial
- People working within BlueLight Commercial in any third-party capacity, including consultants, contractors and third-party agency staff
- Board Members of BlueLight Commercial
- People volunteering within BlueLight Commercial

2. The Law

2.1 Bribery

Bribery is the offer, promise, giving, demanding or acceptance of an advantage as an inducement for an action which is illegal, unethical, a breach of trust or the improper performance of a contract. Bribery is not limited to monetary transactions. For example, bribery can be the offering, giving, receiving or soliciting of something of value for the purpose of influencing an individual, in the performance of their duty and incline them to act dishonestly.

Bribes can take many forms but typically involve corrupt intent. There will usually be an arrangement where both parties will benefit. A bribe could be:

- The direct or indirect promise, offering or authorisation of anything of value
- The offer or receipt of any kickback, loan, fee, reward, gift or other advantage
- The giving of aid, donations or voting designed to exert improper influence

You could face up to 10 years in prison for offering, promising, giving, asking for, or accepting a bribe, as this is a criminal offence.

BlueLight Commercial may, as a Company, also face sanctions if BlueLight Commercial doesn't stop bribery taking place. Sanctions can include an unlimited fine and being excluded from public contract tenders.

3. Facilitation Payments and Kickbacks

BlueLight Commercial does not make, and will not accept, facilitation payments or “kickbacks” of any kind. BlueLight Commercial defines kickbacks as payments made in return for a business advantage or favour. BlueLight Commercial defines facilitation payments as unofficial (and usually small) payments, made to speed up or smooth out a routine process or activity. They are sometimes described as ‘back-handers’. Recipients typically include government or other officials. You must avoid being put in a position where you might be asked to make or accept a kickback or facilitation payment on behalf of BlueLight Commercial. You must also avoid being put in a position from where it could be inferred that such a payment was available.

If anyone asks you to make a payment on behalf of BlueLight Commercial, you must consider carefully whether what they’re asking for is in proportion to the goods or services involved. Always get a receipt, and if you have any concerns you must discuss them with your manager straightaway or if you are a Board Member of BlueLight Commercial you should raise your concerns with BlueLight Commercial’s Audit Committee.

4. Gifts, Entertainment and Hospitality

Gifts, entertainment and hospitality include the receipt and/or offer of gifts, meals or tokens of appreciation or gratitude, or invitations to events, functions, or other social gatherings, in matters connected with BlueLight Commercial.

BlueLight Commercial maintains a single Register of Gifts, Gratuities and Hospitality (the Register), which is under the direct control of the Corporate Business Manager. They will ensure scrutiny, auditing and governance of the register in line with wider corporate governance arrangements, for integrity and counter corruption.

[Follow this link for the Register.](#)

You must complete the Register if you are offered Gifts, Gratuities or Hospitality, including those outlined as acceptable below, and report this to your line manager.

BlueLight Commercial Board Members are only required to complete the Register in regard to Gifts, Gratuities or Hospitality received in connection with their role for BlueLight Commercial. Refusals to accept a gift, gratuity or hospitality must also be recorded in the Register as this will provide intelligence in cases where attempts are made to corrupt staff through such offers.

The Register will be reviewed as a standing item at BlueLightCommercial’s Audit Committee. BlueLight Commercial recognises that the practice of the giving and receiving of business gifts or hospitality varies between countries and regions and what may be normal and acceptable in one region may not be in another. The test to be applied is whether in all circumstances, the gift and/or hospitality, is reasonable and justifiable. The intention behind the gift should always be considered.

4.1 Considerations

The following considerations will help you determine the boundaries of acceptability of any gift, gratuity or hospitality. The **GIFT** mnemonic is commonly used:

- Is it **Genuine**: Is this offer made for reasons of genuine appreciation for something done? Why is the offer being made? What are the circumstances? Has the offer been solicited in any way or does the donor feel obliged to make the offer?
- Is it **Independent**: Would the offer or acceptance be seen as reasonable in the eyes of the public? Would a reasonable bystander be confident that you could remain impartial and independent in all the circumstances?
- Is it **Free**: Are you obliged to do something in return? How do you feel about the propriety of the offer? What are the donor's expectations should you accept?
- Is it **Transparent**: Would you be comfortable if your acceptance of the offer was transparent to BlueLight Commercial, colleagues and the public if it was reported publicly? What could be the outcome for BlueLight Commercial if this offer was accepted or declined?

4.2 Gifts

A Gift may be accepted if it is:

- Of a small or inexpensive nature (e.g. diaries, calendars, stationary or other small items offered during a courtesy visit or conference); or
- A small commemorative item from visiting law enforcement or governmental agencies or similar organisations.
- Acceptable items include biscuits, chocolates, flowers and items of nominal value of less than £10. Alcohol is never acceptable.

A Gift should not be accepted if it is:

- From external contractor or company actively tendering for work with BlueLight Commercial or wider blue light services whom it serves;
- A cash payment; or
- A financial reward resulting from the publication of articles relating to the intended recipients' role or duties as an employee or director of BlueLight Commercial; or
- During Purdah (if you are a Police/Fire and Crime Commissioner or member of their staff);
- From any supplier or potential supplier in the category of a commercial or procurement process being undertaken by BlueLight Commercial.

4.3 Hospitality

Hospitality may be accepted if it:

- Extends to the impromptu provision of light refreshments during the course of BlueLight Commercial activities;
- Is part of an industry, conference, or supplier event not in a tender period where food or refreshments are provided as part of the event
- In either case there is no requirement to declare any such hospitality in the Register.

Hospitality at social or sporting functions:

- Offers to attend social or sporting functions in a capacity which could be construed as being connected with BlueLight Commercial, should only be accepted when these functions are part of community life, or where BlueLight Commercial needs to be seen to be officially represented.

Hospitality should not be accepted if it is:

- During Purdah (if you are a Police/Fire and Crime Commissioner or member of their staff);
- From any supplier or potential supplier in the category of a commercial or procurement process being undertaken by BlueLight Commercial.
- Includes a degree of lavishness which is outside of the industry norm, or is beyond any sense of common courtesy or reasonableness; or
- Amounts to regular free or discounted food or refreshments, or where the hospitality offered is made because you work for BlueLight Commercial and it does not form part of a recognised, formally negotiated discount scheme.
- Should you be offered such discounts you should courteously refuse. Where such offers are made on a regular or more persistent basis you should report the matter to your line manager. Line managers should advise the person offering such discounts of this policy, in order to dissuade them from making such offers and to advise them of the facility to set up a formal agreement with BlueLight Commercial if there is one. It may be appropriate for staff to avoid purchasing food from such outlets to avoid any embarrassment or compromise.

5. Responsibilities

You must ensure that you read, understand and comply with this policy. The prevention, detection and reporting of bribery and other forms of corruption are the responsibility of all those working for and with BlueLight Commercial. All associated staff are required to avoid any activity that might lead to, or suggest, a breach of this policy.

You must notify your line manager or the Corporate Business Manager as soon as possible, if you believe, or suspect that a conflict with this policy has occurred, or may occur in the future. If you are a Board Member and you believe, or suspect that a conflict with this policy has occurred, you should raise this with the Audit Committee who will consider the matter and provide you with guidance and take appropriate action as required.

Any breach of this policy can lead to disciplinary action, which could result in dismissal for gross misconduct. BlueLight Commercial reserves the right to terminate a contractual relationship with other associated staff if they breach this policy.

6. Record Keeping

BlueLight Commercial must keep financial records and have appropriate internal controls in place, to evidence the business reason for making payments to third parties.

You must declare and keep a written record of all hospitality or gifts accepted or offered in the 'Gift and Hospitality Register' on Microsoft Teams.

This can be found in Microsoft Teams -> BLC Policies -> Gifts and Hospitality Register or through this [link](#).

You must ensure that all expenses claims relating to hospitality, gifts or expenses incurred to third parties are submitted in accordance with BlueLight Commercial's Expenses Policy.

Expenses incurred by Board Members should be recorded as required by the BlueLight Commercial Board.

All accounts, invoices, memoranda and other documents and records relating to dealings with third parties, such as clients, suppliers and business contacts, should be prepared and maintained with strict accuracy and completeness. No accounts must be kept "off-book" to facilitate or conceal improper payments.

7. Raising a Concern

It is important that you tell your Line Manager as soon as possible if you are offered a bribe by a third party, are asked to make one, suspect that this may happen in the future, or believe that you are a victim of another form of unlawful activity. Your manager will then report this to the Corporate Business Manager.

If you feel unable to speak to your line manager about this then you should contact the Corporate Business Manager Directly.

If you are a Board Member and you are offered a bribe by a third party, are asked to make one, suspect that this may happen in the future, or believe that you are a victim of another form of unlawful activity. You should report this immediately to the Audit Committee who will advise you in regard to next steps.

7.1 Protection

You need to be assured that it is safe and acceptable for you to speak up about your concerns. BlueLight Commercial is committed to ensuring that you do not suffer victimisation or detriment for raising a genuine concern under this Anti-Bribery Policy. If you believe you have suffered any type

of reprisal by making a disclosure, you should liaise with your line manager, the Corporate Business Manager or the HR Business Partner immediately,

they can then support you and take any appropriate action. If you wish to make a formal complaint, you can raise this through the Grievance Policy.

If you are a Board Member and wish to raise a concern under this Anti-Bribery Policy then you should raise this with the Audit Committee who will consider the matter and provide you with guidance and take appropriate action as required.



 BlueLight
Commercial

Lloyd House,
Colmore Circus Queensway,
Birmingham,
B4 6DG

enquiries@bluelight.police.uk

Registered Company Address:

Lower Ground 5-8 The Sanctuary,
Westminster,
London,
United Kingdom,
SW1P 3JS