



**BLCP0039**

**Anti-Bribery and Gifts and  
Hospitality Policy**



Document Title:	<b>Anti-Bribery and Gifts and Hospitality Policy</b>
Document Number:	<b>BLCP0039</b>
Effective Date:	24/01/2024

## Document Control

Responsible Officer:	Chief Executive Officer
Date for next review	January 2026

## 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.
2.0		Caroline Moss, Corporate Business Manager		Updated onto new policy template. Significant changes to content following review.
3.0	12/01/2024	Janine Nelson, Legal Services	24/01/2024	Policy extended to be more explicit on gifts & hospitality. Significant changes to content following review. 17/1/2025 reviewed by ARFCC as part of annual review of governance policies, content to support its continued adoption and implementation.

## Related documents

Document Number	Document Name	File Location
BLCP0038	Grievance Policy	Hi-Bob
BLCP0012	Travel & Expenses Policy	Hi-Bob
BLCP0010	Whistleblowing Policy	Hi-Bob

# Contents

1. Purpose	4
2. Scope	4
3. Key Principles	4
4. Accountability	8
5. Exceptions	8
6. Training	8
7. Communication	9
8. Review	9
Appendix A	10
Appendix B	11

## 1. Purpose

- 1.1. 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 and gives guidance on BlueLight Commercial's gifts and hospitality policy. The definitions are set out in Appendix A.
- 1.2. The Policy sets out:
  - 1.2.1. the responsibilities of the organisation and users in observing and upholding the position on bribery and corruption;
  - 1.2.2. information and guidance to users to recognise and deal with bribery and corruption issues; and
  - 1.2.3. evaluates, records and reports on what it considers reasonable and appropriate gifts and hospitality.
- 1.3. BlueLight Commercial takes its legal responsibilities seriously. It is a criminal offence to offer, promise, give, request, or accept a bribe. Individuals found guilty can be punished by up to ten years' imprisonment and/or a fine. As an employer if the organisation fails to prevent bribery, it can face an unlimited fine, exclusion from tendering for public contracts, and damage to its reputation.

## 2. Scope

- 2.1. This policy applies to:
  - 2.1.1. All employees of BlueLight Commercial.
  - 2.1.2. Secondees to BlueLight Commercial.
  - 2.1.3. Volunteers in BlueLight Commercial.
  - 2.1.4. People working within BlueLight Commercial in any third-party capacity, including but not limited to consultants, contractors, visitors with temporary access privileges, third-party agency staff and whether registered as a user with BlueLight Commercial or not
  - 2.1.5. BlueLight Commercial Board members  
(collectively referred to as 'users').
- 2.2. This policy applies to all business conducted by users.
- 2.3. All users will be deemed to be familiar with and bound by this policy.

## 3. Key Principles

- 3.1. The key principles of this policy are that it is not acceptable for a user (or someone on the user's behalf) to:

- 3.1.1 Give, promise to give, or offer, a payment, gift or hospitality with the expectation or hope that a business advantage will be received, or to reward a business advantage already given.
  - 3.1.2 Give or accept a gift or hospitality from an external contractor or company actively tendering for work with BlueLight Commercial or the wider blue light services whom it serves.
  - 3.1.3 Give or accept a gift or hospitality from any supplier or potential supplier in the category of a commercial or procurement process being undertaken by BlueLight Commercial.
  - 3.1.4 Accept a payment, gift or hospitality from a third party that the user knows, or suspects is offered with the expectation that it will provide a business advantage for them or anyone else in return.
  - 3.1.5 Accept hospitality from a third party that is in excess of genuine and reasonable business expenses under the circumstances.
  - 3.1.6 Offer or accept a gift to or from government officials or representatives, or politicians or political parties.
  - 3.1.7 Threaten or retaliate against another individual who has refused to commit a bribery offence or who has raised concerns under this policy.
  - 3.1.8 Engage in any other activity that might lead to a breach of this policy.
- 3.2. BlueLight Commercial does not make and will not accept facilitation payments or "kickbacks" of any kind. A user must avoid any activity that might lead to a facilitation payment or kickback being made or accepted by BlueLight Commercial or on BlueLight Commercial's behalf, or that might suggest that such a payment will be made or accepted. If a user is asked to make a payment on BlueLight Commercial's behalf, they should always be mindful of what the payment is for and whether the amount requested is proportionate to the goods or services provided. The user should always ask for a receipt which details the reason for the payment. If the user has any suspicions, concerns or queries regarding a payment, they should raise these with the HR team.
- 3.3. This Policy allows reasonable and appropriate hospitality or entertainment given to or received from third parties, for the purposes of:
- 3.3.1. Establishing or maintaining good business relationships.
  - 3.3.2. Improving or maintaining BlueLight Commercial's image or reputation.
  - 3.3.3. Marketing or presenting BlueLight Commercial's products and/or services effectively.
- 3.4 BlueLight Commercial maintains a single Register of Gifts, Gratuities and Hospitality (the Register), which is under the direct control of the Company Secretary. They will ensure scrutiny, auditing and governance of the register in line with wider corporate governance arrangements, for integrity and counter corruption. A user must complete the Register if they are offered Gifts, Gratuities or Hospitality, including those outlined as acceptable below, and report this to their 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.

- 3.5 The following considerations will help the user determine the boundaries of acceptability of any gift, gratuity or hospitality. The **GIFT** mnemonic is commonly used:
- 3.5.1 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?
  - 3.5.2 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 the user could remain impartial and independent in all the circumstances?
  - 3.5.3 Is it **Free**: Is the user obliged to do something in return? How does the user feel about the propriety of the offer? What are the donor's expectations should you accept?
  - 3.5.4 Is it **Transparent**: Would the user be comfortable if their 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?
- 3.6 The giving and accepting of gifts is allowed if the following requirements are met:
- 3.6.1 it complies with the key principles set out in clause 3.1;
  - 3.6.2 it is not made with the intention of influencing a third party to obtain or retain business or a business advantage, or to reward the provision or retention of business or a business advantage, or in explicit or implicit exchange for favours or benefits;
  - 3.6.3 it is given in BlueLight Commercial's name, not in the user's name;
  - 3.6.4 it does not include cash or a cash equivalent (such as gift certificates or vouchers);
  - 3.6.5 it is not a financial reward resulting from publication of articles relating to the intended user's role or duties as an employee or director of BlueLight Commercial;
  - 3.6.6 it is appropriate in the circumstances, taking account of the reason for the gift, its timing and value. For example, in the UK it is customary for small gifts to be given at Christmas;
  - 3.6.7 it is given openly, not secretly;
  - 3.6.8 it complies with any applicable local law; and
  - 3.6.9 It is of a small or inexpensive nature (eg diaries, calendars, stationery, biscuits, chocolates, flower or other small items with a nominal value of less than £10 although alcohol is never acceptable) or it is a small commemorative item from visiting law enforcement or governmental agencies or similar organisations.
- 3.7 Hospitality is allowed if the following requirements are met:
- 3.7.1 It complies with the key principles in clause 3.1;

- 3.7.2 It is an impromptu provision of light refreshments during the course of BlueLight Commercial activities;
- 3.7.3 It 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
- 3.7.4 If it is an offer to attend social or sporting functions in a capacity which could be construed as being connected with BlueLight Commercial, it should only be accepted when these functions are part of community life, or where BlueLight Commercial needs to be seen to be officially represented.
- 3.7.5 If it does not exceed genuine and reasonable expenses in the circumstances, or is beyond any sense of common courtesy or reasonableness; and
- 3.7.6 If it does not amount to regular free or discounted food or refreshments, or where the hospitality offered is made because the user works for BlueLight Commercial and it does not form part of a recognised, formally negotiated discount scheme.

In the case of clause 3.7.2 and 3.7.3 above, there is no requirement to declare any such hospitality in the Register. Should any user be offered such discounts they should courteously refuse. Where such offers are made on a regular or more persistent basis they should report the matter to their 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.

- 3.8 Reimbursing a third party's expenses or accepting an offer to reimburse the user's expenses (for example, the costs of attending a business meeting) would not usually amount to bribery. However, a payment in excess of genuine and reasonable business expenses (such as the cost of an extended hotel stay) is not acceptable.
- 3.9 The organisation appreciates that practice 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 the circumstances the gift, hospitality or payment is reasonable and justifiable. The intention behind it should always be considered.
- 3.10 Users must raise concerns about any issue or suspicion of bribery or corruption at the earliest possible stage. A list of possible red flags that may arise during the course of a user working for BlueLight Commercial and which may raise concerns under various anti-bribery and anti-corruption laws is given in Appendix B. The list is not intended to be exhaustive and is for illustrative purposes only. If a user encounters any of these red flags while working for BlueLight Commercial, they must report them promptly to their manager **OR** to the Head of Business Services **OR** using the procedure set out in the Whistleblowing policy. If the user is a Board Member and they believe or suspect that a conflict with this policy has occurred, they should raise this with the Audit and Risk Committee who will consider the matter and provide them with guidance and take appropriate action as required.
- 3.11 All users should be assured that it is safe and acceptable for them to speak up about their concerns. BlueLight Commercial is committed to ensuring that any user does not suffer victimisation or detriment for raising a genuine concern under this Anti-Bribery Policy. If a

user believes they have suffered any type of reprisal by making a disclosure, they should liaise with their line manager, the Head of Business Services or the HR Business Partner immediately, they can then support the user and take any appropriate action. If any user wishes to make a formal complaint, they can raise this through the Grievance Policy.

## 4. Accountability

- 4.1 BlueLight Commercial takes a zero-tolerance approach to bribery and corruption and is committed to acting professionally, fairly and with integrity in all its business dealings and relationships wherever the organisation operates and implementing and enforcing effective systems to counter bribery and corruption
- 4.2 BlueLight Commercial must keep financial records and have appropriate internal controls in place, to evidence the business reason for making payments to third parties.
- 4.3 All users must declare and keep a written record of all hospitality or gifts accepted or offered in the 'Gift and Hospitality Register' which can be accessed via the Intranet Useful Documents and Resources page.
- 4.4 All users must ensure that all expenses claims relating to hospitality, gifts or expenses incurred to third parties are submitted in accordance with BlueLight Commercial's Travel & Expenses Policy.
- 4.5 Expenses incurred by Board Members should be recorded as required by the BlueLight Commercial Board.
- 4.6 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.
- 4.7 Any user found to have violated this policy may be subject to disciplinary action from within their organisation, up to and including termination of employment and criminal liability for the individual involved (up to and including imprisonment).
- 4.1 BlueLight Commercial may also terminate its relationship with other individuals and organisations working on its behalf if they breach this policy.

## 5 Exceptions

- 5.1 There are no exceptions to this policy.

## 6 Training

- 6.1 The following training plan will be adopted to ensure compliance with the policy:
  - 6.1.1 Training will be given to all new staff as part of their induction process.
  - 6.1.2 Additional training if required/requested will be provided as necessary.

6.1.3 Annual refresher training may be provided.

## 7 Communication

- 7.1 The following methods will be adopted to ensure full knowledge of the policy:
- 7.1.1 The policy will be published on the HR system, Hibob.
  - 7.1.2 Any associated procedure or process will be published on the HR system, Hibob.
  - 7.1.3 Any updates to the policy will be communicated via the staff Weekly Bulletin or through a Hibob Shoutout.
  - 7.1.4 The organisation's zero tolerance approach to bribery and corruption must be communicated to all suppliers, contractors and business partners at the outset of any business relationship with them and as appropriate thereafter.
- 7.2 Employees and associated persons are required to keep accurate, detailed and up to date records of all corporate hospitality, entertainment or gifts accepted or offered on the Gifts and Hospitality Form which will be subject to line manager approval.

## 8 Review

- 8.1 As part of the corporate governance review, this policy will be reviewed annually, or more frequently as required, i.e. following an incident, organisational change, change in business operations or risk profile, to ensure the policy continues to fulfil its purpose.
- 8.2 The Register will be reviewed as a standing item at BlueLight Commercial's Audit and Risk Committee.
- 8.3 Comments or suggestions regarding the policy are invited from users and should be directed to the Responsible Officer for consideration.
- 8.4 The Responsible Officer is responsible for keeping this policy up to date.
- 8.5 BlueLight Commercial reserves the right to amend the policy at any time.
- 8.6 Compliance with the policy will be reviewed annually and records will be made available for audit inspection as and when required.

## Appendix A

### **DEFINITIONS**

**Bribery** is offering, promising, giving or accepting any financial or other advantage, to induce the recipient or any other person to act improperly in the performance of their functions, or to reward them for acting improperly, or where the recipient would act improperly by accepting the advantage.

An **advantage** includes money, gifts, loans, fees, hospitality, services, discounts, the award of a contract or anything else of value.

A person acts **improperly** where they act illegally, unethically, or contrary to an expectation of good faith or impartiality, or where they abuse a position of trust. The improper acts may be in relation to any business or professional activities, public functions, acts in the course of employment, or other activities by or on behalf of any organisation of any kind.

**Corruption** is the abuse of entrusted power or position for private gain.

#### **Examples:**

**Offering a bribe:** You offer a potential client tickets to a major sporting event, but only if they agree to do business with us.

This would be an offence as you are making the offer to gain a commercial and contractual advantage. We may also be found to have committed an offence because the offer has been made to obtain business for us. It may also be an offence for the potential client to accept your offer.

**Receiving a bribe:** A supplier gives your nephew a job but makes it clear that in return they expect you to use your influence in our organisation to ensure we continue to do business with them.

It is an offence for a supplier to make such an offer. It would be an offence for you to accept the offer as you would be doing so to gain a personal advantage.

**Bribing a foreign official:** You arrange for the business to pay an additional "facilitation" payment to a foreign official to speed up an administrative process.

The offence of bribing a foreign public official is committed as soon as the offer is made. This is because it is made to gain a business advantage for us. We may also be found to have committed an offence.

**Facilitation payments**, also known as "back-handers" or "grease payments", are typically small, unofficial payments made to secure or expedite a routine or necessary action (for example by a government official). They are not common in the UK but are common in some other jurisdictions.

**Kickbacks** are typically payments made in return for a business favour or advantage.

## Appendix B

### **POTENTIAL RISK SCENARIOS AND “RED FLAGS”**

1. You become aware that a third party engages in, or has been accused of engaging in, improper business practices.
2. You learn that a third party has a reputation for paying bribes, or requiring that bribes are paid to them, or has a reputation for having a "special relationship" with foreign government officials.
3. A third party insists on receiving a commission or fee payment before committing to sign up to a contract with us or carrying out a government function or process for us.
4. A third-party requests payment in cash and/or refuses to sign a formal commission or fee agreement, or to provide an invoice or receipt for a payment made.
5. A third-party requests that payment is made to a country or geographic location different from where the third party resides or conducts business.
6. A third party requests an unexpected additional fee or commission to "facilitate" a service.
7. A third party demands entertainment or gifts which are in excess of genuine and reasonable business expenses before commencing or continuing contractual negotiations or provision of services.
8. A third-party requests that a payment is made to "overlook" potential legal violations.
9. A third-party requests that you provide employment or some other advantage to a friend or relative.
10. You receive an invoice from a third party that appears to be non-standard or customised.
11. A third party insists on the use of side letters or refuses to put terms agreed in writing.
12. You notice that we have been invoiced for a commission or fee payment that appears large given the service stated to have been provided.
13. A third party requests or requires the use of an agent, intermediary, consultant, distributor or supplier that is not typically used by or known to us.
14. You are offered an unusually generous gift or offered hospitality which is in excess of genuine and reasonable business expenses by a third party.



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

[enquiries@BlueLight.police.uk](mailto:enquiries@BlueLight.police.uk)

Registered Company Address:

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