

# WheelPower

## Fraud, Corruption and Bribery Policy

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WheelPower has a strict policy on anti-fraud, anti-corruption and anti-bribery and conducts its business to high standards. WheelPower is committed to protecting public resources, charitable revenue, assets and information from attempts to gain or benefit from fraud, corruption and bribery. We do not offer or accept bribes as an encouragement to improper conduct.

Neither do we tolerate such behaviour by those who represent or receive funds from us. We expect all suppliers, stakeholders and grant recipients whether they are an individual or organisation to:

- Comply with the Bribery Act 2010.
- Never offer a bribe to any of our staff, panel or board members.
- Never offer or accept a bribe on our behalf.

WheelPower abides by its policy and guidance on gifts and hospitality and disclosure of potential conflicts of interests for Board and Sub-committee members and members of staff.

Our **Whistleblowing Policy** contains information on who to contact if you suspect a member of staff, Board or Panel member is engaged in fraud, corruption or bribery.

### Context

WheelPower values its reputation and is committed to maintaining the highest level of ethical standards. The actions and conduct of the charity's staff are crucial to maintaining these high standards.

The policy applies to all employees, trustee/directors, agents, consultants, contractors and all other people or bodies associated with WheelPower.

### Recognising Bribery and Corruption

Acts of bribery or corruption are designed to influence an individual in the performance of their duties and encourage them to behave in a way that a reasonable person would consider to be dishonest.

Bribery can be defined as offering, promising or giving a financial (or other) advantage to another person with the intention of inducing or rewarding that person to act or for having acted in a way that a reasonable person would consider improper in the circumstances. Corruption is any form of abuse of entrusted power for private gain and may include, but is not limited to, bribery.

Bribes are not always a matter of providing cash. Gifts, hospitality and entertainment can also be bribes where the intention is to influence a decision.

### Potential Penalties

The Bribery Act became law on 1 July, 2011. Under the act bribery by individuals is punishable by up to 10 years' imprisonment and/or an unlimited fine. If the charity is found to have taken

part in the bribery or is found to lack adequate procedures to prevent bribery, it too could face an unlimited fine.

A conviction for a bribery or corruption related offence will have significant reputational and/or financial consequences for the charity.

### **Bribery and Corruption Policy**

WheelPower will not tolerate bribery or corruption in any form.

WheelPower prohibits the offering, giving, solicitation or the acceptance of any bribe or corrupt inducement, whether in cash or in any other form:

- To or from any person or company whether a public official or public body, or a private individual or company;
- By any individual employee, director, agent, consultant, contractor or other person or body acting on behalf of WheelPower;
- In order to gain any commercial, contractual or regulatory advantage for WheelPower which is in any way unethical or to gain any personal advantage, pecuniary or otherwise, for the individual or anybody connected with the individual.

This policy is not intended to prevent the following practices provided they are appropriate, reasonable, and proportionate and provided they are properly recorded:

- Normal hospitality,
- Fast tracking a process which is available to all on payment of a fee; and/or
- Providing resources to assist a person or body to make a decision more efficiently, provided it is for that purpose alone.

It may not always be a straightforward matter to determine whether a possible course of action is appropriate. If in doubt as to whether an act might breach this policy or the law, the matter should be referred to your Head of Department.

WheelPower will investigate thoroughly any actual or suspected breach of this policy, or the spirit of this policy. Employees found to be in breach of this policy may be subject to disciplinary action which may result in dismissal.

### **What to do to Raise a Concern**

All WheelPower employees have a responsibility in preventing and reporting bribery or corruption. Should you become aware of or be suspicious of any activity that is either proposed or has taken place is a bribe or corrupt then you have a duty to report this.