



Anti-Bribery Policy

POLICY STATEMENT

1. This policy has been created to comply with the requirements of The Bribery Act 2010.
2. The Northern Lighthouse Board has a zero-tolerance to bribery and corruption. This policy extends to all the Board's business dealings and transactions and these both have a wide interpretation across all functions.
3. The policy is given force in a detailed anti-bribery programme which is regularly monitored and reviewed to capture changes in law, reputation, demands and changes in our business.
4. The Senior Responsible Officer (SRO) within NLB is the Chief Executive.

WHO IS COVERED BY THIS POLICY?

5. All Commissioners, staff and Business Relationships.

WHAT IS BRIBERY?

6. The offering, promising, giving, accepting or soliciting of an advantage as an inducement for an action which is illegal or a breach of trust.

WHAT IS CORRUPTION?

7. The abuse of entrusted power for private gain or advantage. *It hurts everyone whose life, livelihood or happiness depends on the integrity of people in a position of authority.*

HOW WILL THE POLICY BE IMPLEMENTED?

8. The Policy will be implemented by:
 - An anti-bribery programme which will be actively managed and communicated to all our staff, to ensure that the policy is fully and consistently delivered in all our business dealings and transactions across all functions.
 - The visible commitment of the Board of Commissioners leading to the encouragement of the full participation of all Staff and all our business relationships.
 - The Executive Group will regularly monitor and review the events that could give rise to bribery, the risk exposure to these events and the adequacy of the risk treatments in place. This will include reporting to the Board of Commissioners.

Document Name:	OP06: Documented Information and Data Control		
Version Nr.	Issue Date	Owner	Security Classification
0.1	26/11/2019 12:35	Mike Bullock	Official

- Internal control issues including those identified by Internal and External Audit on implementing the policy and programme and the results of risk assessments will be regularly reported to the Audit & Risk Committee.

WHAT SPECIFIC CONTROLS ARE IN PLACE?

9. There are four specific areas that can often be used as a subterfuge for bribery. We prevent this happening by:
 - **Political contributions** - We do not make political contributions under any circumstances. A political contribution is any contributions made in cash or kind to support a political cause, whether directly or indirectly.
 - **Facilitation Payments** – We do not make facilitation payments under any circumstances. These are small unofficial payments made to secure or expedite the performance of a routine or necessary action to which the payer of the facilitation payment has legal or other entitlement.
 - **Sponsorship and charitable donations** - We very occasionally provide sponsorship for events and individuals and charitable donations. These can only be approved by the Chief Executive, whose approval will be contingent on, among other things, his personal assessment that it is not a subterfuge for bribery. All such payments will be accurately recorded and clearly declared in our financial records, statements and reports.
 - **Gifts and hospitality** - We have separate written policies and procedures in place covering the giving and receiving of gifts and hospitality. These make it clear on the risks of these being used a subterfuge for bribery.

HOW WILL WE COMMUNICATE THE RESULTS OF IMPLEMENTING THE POLICY?

10. We will also regularly report on our Website and in our Annual Report & Accounts our progress in implementing the programme.

WHAT IS EXPECTED OF THE PEOPLE COVERED BY THIS POLICY?

11. All Commissioner and staff will be required to:
 - Understand how the policy and programme impact on themselves and their job.
 - Attend any training or other events designed to communicate the policy and the programme.
 - comply with the policy and the anti-bribery programme at all times
 - Re-sign the policy each year as evidence of their continued understanding of the policy, the programme and the impact on themselves and their own job.
 - Seek advice if unclear or unsure of any aspect of this policy and programme.

Document Name:	OP06: Documented Information and Data Control		
Version Nr.	Issue Date	Owner	Security Classification
0.1	26/11/2019 12:35	Mike Bullock	Official

12. In meeting these requirements no employee will suffer demotion, penalty or other adverse consequences for refusing to pay bribes even if the Board loses business.
13. All Business relationships will be required to:
 - Understand how the policy and programme impact on themselves and their relationship.
 - Attend any training or other events designed to communicate the policy and the programme.
 - comply with the policy and the anti-bribery programme at all times
 - Sign the policy as evidence of their continued understanding of the policy, the programme and the impact on themselves and their own relationship. This may be part of the contract terms for Suppliers or in documentation appropriate to the relationship.
 - Seek advice if unclear or unsure of any aspect of this policy and programme.
14. Reporting of any act of bribery identified or suspected, in confidence, using the contacts and procedures contained within our Whistle Blowing Policy.

WHAT ARE THE PENALTIES OF BREACHING THIS POLICY?

15. The Bribery Act 2010 makes provision for individual and corporate responsibility with imprisonment for up to 10 years and unlimited fines depending upon the nature of the offence for individuals and corporate fines that may be unlimited.
16. Commissioners and Staff will be subject to our disciplinary procedures which could result in dismissal. There is also the possibility that criminal and or civil legal action will be taken.
17. Those acting in a Business Relationship (including Agents, Suppliers and Contractors) with NLB will have their business relationship terminated, the matter will be reported to the appropriate authorities and there is the possibility of criminal and or civil legal action.

ADDITIONAL INFORMATION CAN BE FOUND WITHIN:

- HR Manual
- Finance Manual
- Procurement Manual
- Guide to Governance
- DfT/GLAs Framework Document
- Fraud Response Plan
- Risk Registers
- Whistle Blowing Policy
- The Bribery Act 2010

Document Name:	OP06: Documented Information and Data Control		
Version Nr.	Issue Date	Owner	Security Classification
0.1	26/11/2019 12:35	Mike Bullock	Official