





### Statement of intent

The aim of this policy is to help employees understand what to do if they are offered gifts and hospitality, and to provide a clear framework to ensure that all relevant parties understand what constitutes bribery, corruption, or exposes the charity to accusations (founded or unfounded) of unethical or unlawful behaviour.

Aiming Higher is committed to carrying out its business fairly, honestly and openly. We believe that we should NOT receive benefits of any kind from third parties which might reasonably be seen to compromise our personal judgement and integrity.

Aiming Higher values its reputation for ethical behaviour and financial probity and reliability.

Aiming Higher recognises that any involvement in bribery is both illegal and will adversely impact its image and reputation.

### Bribery

A bribe means a financial or other inducement or reward for action which is illegal, unethical, a breach of trust or improper in any way. Bribes can take the form of money, gifts, loans, fees, hospitality, services, discounts, the award of a contract or any other advantage or benefit.

Bribery includes:

- offering,
- promising,
- giving,
- accepting
- seeking a bribe.

All staff, volunteers and other parties have a responsibility to help in the prevention, detection and reporting of bribery. Specifically, you must not:

- give or offer any payment, gift, hospitality, or other benefit in the expectation that a business advantage will be received in return, or to reward any business received
- accept any offer from a third party that you know, or suspect is made with the expectation that we will provide a business advantage for them or anyone else
- give or offer any payment (sometimes called a facilitation payment) to a government or local council official to facilitate or speed up a routine or necessary procedure
- you must not threaten or retaliate against another person who has refused to offer or accept a bribe or who has raised concerns about possible bribery or corruption.
- you must not knowingly fail to challenge or report suspicions of bribery or corruption



### Gifts or Donations Received by Aiming Higher

Aiming Higher, in deciding whether to accept or decline a donation or gift, will consider the charity's best overall interest and will not accept donations from donors whose activities appear to be in direct conflict with our charitable aims and objectives.

An employee or volunteer or any member of their family/friends should not, directly or through others, solicit or accept money, gifts, hospitality, or anything else that could influence or reasonably give the appearance of influencing the relationship with that organisation or individual.

Unless you have been informed otherwise you may accept a gift to a nominal value of £25, such as a box of chocolates or biscuits, advertising novelty or small seasonal gift when it is customarily offered to others having a similar relationship with that individual or organisation e.g., at a conference or exhibition or as part of an awareness raising or advertising campaign.

It must be made clear to the person or organisation that is giving the gift that the gift will be brought back to the Aiming Higher office where a decision will be made as to how to use the gift.

Aiming Higher will not take gifts from organisations or individuals who participate in activities which:

- Could cause detriment to the charity's reputation.
- Will disproportionately decrease the amount of donations to further the work of the charity.
- Undermine our vision and values.
- Are associated with unsuitable products, corporate and individuals eg arms dealings and tobacco.
- Are from individuals, groups or organisations which are known to take advantage of children, older or vulnerable people.
- Are personal gifts to Aiming Higher staff members, which should be discouraged at all times.
- Are from unknown sources of funding. Aiming Higher will take reasonable steps to determine the ultimate source of funding for each gift and satisfy itself that the funds do not derive, directly or indirectly, from activity that was or is illegal.
- Potentially harm our relationships with other donors, service users, stakeholders or volunteers.
- Expose us to undue adverse publicity or reputational risk.
- Require unacceptable expenditure or additional charity resources.

If supporters wish to make a donation to a specific area of Aiming Higher's work, then they make a specified donation by providing written instruction to this effect with their donation. Aiming Higher





will always respect this. If Aiming Higher is unable to accept the request for the specified donation and the sponsor does not want the donation used in any other way Aiming Higher will refund the donation.

#### **Refusals of Donations or Gifts**

If a gift is received which may not be acceptable under the terms of this policy the recipient will alert their Line Manager or Chair of Trustees at the earliest opportunity. This will be researched further, and the matter will be referred to the Board of Trustees with the necessary information regarding the donation.

#### **Record Keeping**

You must declare all hospitality and gifts given or received and enter them into the Gifts Register. You must also submit all expenses claims relating to hospitality, gifts or payments to third parties and record the reason for expenditure. Accounts must not be kept "off-book" to facilitate or conceal improper payments.

#### **How to Raise a Concern**

If any member of staff, volunteer, or any other party, is concerned about a gift that has been given or offered which may represent a possible breach of these rules they should approach their Line Manager or Chair of Trustees (email: [chair@aiminghighercharity.org.uk](mailto:chair@aiminghighercharity.org.uk)) who will treat any such information in confidence, or they should report it in accordance with our Whistleblowing Policy as soon as possible.

Staff and volunteers should also consult their Line Manager if they have any questions – however minor - about the interpretation and application of this policy.