Centre for Chaplaincy in Education
Anti-Bribery & Anti-Corruption Policy

Policy Approval and Review Record

	Date
Policy approved by trustees	*January 2026*
Policy reviewed by trustees	*Due January 2028*

1. Purpose of this Policy

1.1 The Centre for Chaplaincy in Education ("CCE") is committed to conducting all its activities with honesty, integrity, and transparency. This policy sets out CCE's zero-tolerance approach to bribery and corruption and outlines the responsibilities of those working with or for CCE.

1.2 This policy provides guidance to help individuals recognise, prevent, and respond appropriately to bribery and corruption risks.

1.3 This policy supports CCE's obligations under the **Bribery Act 2010** and the **Charity Commission's guidance on protecting charities from fraud and financial crime**.

2. Policy Statement

2.1 CCE has a zero-tolerance approach to bribery and corruption. We are committed to acting professionally, fairly, and with integrity in all our charitable activities, partnerships, fundraising, and relationships.

2.2 CCE will comply with all applicable laws relating to bribery and corruption, including the Bribery Act 2010, in all areas of our work.

2.3 Bribery and corruption are serious criminal offences. Individuals may face imprisonment and fines, and charities can face unlimited fines and serious reputational damage. CCE therefore takes its responsibilities to prevent bribery and corruption seriously.

2.4 CCE recognises that, as a small charity, our activities are modest in scale. Our procedures and controls will therefore be **proportionate to the risks we face**, while remaining robust and effective.

3. Who This Policy Applies To

3.1 This policy applies to:

- Trustees
- Employees
- Volunteers and interns
- Contractors, consultants, and agents
- Any other person acting on behalf of CCE

3.2 The policy applies to all activities carried out for or on behalf of CCE, whether in the UK or elsewhere.

3.3 All third parties working with CCE are expected to act consistently with this policy. Where appropriate, contractual arrangements will include provisions requiring compliance with anti-bribery standards.

4. What Is Bribery?

4.1 Bribery is the offering, promising, giving, requesting, agreeing to receive, or accepting something of value in order to improperly influence a decision or action.

4.2 A bribe can take many forms, including money, gifts, hospitality, services, favours, or other advantages.

4.3 Bribery can occur whether the advantage is offered directly or indirectly, including through a third party.

4.4 It is illegal both to offer a bribe and to accept one. If you are unsure whether something constitutes a bribe, you must seek advice before proceeding.

5. What Is Acceptable and What Is Not

This section covers:

- Gifts and hospitality
- Facilitation payments and kickbacks
- Political contributions
- Charitable contributions

5.1 Gifts and Hospitality

CCE permits modest and appropriate gifts and hospitality provided that all of the following apply:

a) They are not intended to influence, or be perceived as influencing, a decision or outcome.
b) No return favour is expected or implied.
c) They comply with applicable laws and local customs.
d) They are given or received in the name of CCE, not in a personal capacity.
e) They do not include cash or cash equivalents (such as vouchers).
f) They are reasonable, proportionate, and appropriate to the circumstances.
g) They are given or received openly and transparently.
h) They are not targeted at individuals in a position of undue influence.
i) Their value does not normally exceed **£25**, as approved by the Trustees and reviewed periodically.
j) They are not offered to, or accepted from, government officials or political representatives without prior approval from the Treasurer.

5.2 Where refusing a gift may cause offence due to cultural or religious reasons, it may be accepted but must be declared promptly to the Treasurer for assessment.

5.3 All gifts and hospitality given or received must be declared to the Treasurer and recorded in the **Gifts and Hospitality Register**.

5.2 Facilitation Payments and Kickbacks

5.4 CCE does not permit facilitation payments or kickbacks of any kind.

5.5 Facilitation payments are typically small unofficial payments made to secure or speed up routine actions by public officials. These are illegal under UK law.

5.6 Kickbacks—payments or benefits given in return for favourable treatment—are strictly prohibited.

5.7 Where an individual reasonably believes that refusing a payment would put their personal safety or life at risk, a payment may be made only to the extent strictly necessary. The incident must be reported as soon as reasonably practicable to the Treasurer or Chair of Trustees, with as much detail as possible.

5.3 Political Contributions

5.8 CCE does not make donations or provide support to political parties, candidates, or political organisations.

5.9 This does not prevent CCE from engaging in lawful, non-partisan advocacy that supports its charitable purposes.

5.4 Charitable Contributions

5.10 CCE may make donations to other charities only where this supports CCE's own charitable objectives and is in its best interests.

5.11 Donations may be financial or non-financial (such as services, time, or expertise).

5.12 All charitable donations must be approved in advance by the **Chair of Trustees and Treasurer** and must not be used to disguise or facilitate bribery.

5.13 All charitable contributions will be recorded and disclosed appropriately.

6. Responsibilities

6.1 Everyone covered by this policy must:

- Read, understand, and comply with this policy
- Avoid any activity that could lead to a breach of this policy
- Raise concerns promptly if bribery or corruption is suspected

6.2 Trustees, employees, and volunteers share responsibility for preventing, detecting, and reporting bribery and corruption.

6.3 Any suspected or actual breach must be reported to the Treasurer. If the concern involves the Treasurer, it should be reported to the Chair of Trustees.

6.4 Breaches of this policy may result in disciplinary action, which may include dismissal, removal from office, termination of volunteering arrangements, or termination of contracts, as appropriate.

7. Raising Concerns and Whistleblowing

7.1 CCE encourages the early reporting of any concerns about bribery or corruption.

7.2 Concerns may be raised with:

- Your line manager
- The Treasurer
- The Chair of Trustees

7.3 CCE's Whistleblowing Policy applies to concerns raised under this policy and allows concerns to be raised confidentially and without fear of retaliation.

7.4 Anyone who raises a concern in good faith will be supported, even if the concern turns out to be mistaken.

7.5 No individual will suffer detrimental treatment for refusing to engage in bribery or for reporting concerns. Detrimental treatment includes dismissal, disciplinary action, threats, or unfavourable treatment.

8. Training and Communication

8.1 This policy will be provided to all new trustees, employees, and volunteers as part of induction.

8.2 Training will be provided where appropriate, based on the level of risk associated with an individual's role.

8.3 CCE's zero-tolerance approach to bribery and corruption will be communicated to relevant third parties as appropriate.

9. Record Keeping

9.1 CCE will maintain accurate and transparent financial records and appropriate internal controls.
9.2 A Gifts and Hospitality Register will be maintained and reviewed periodically by the Treasurer.
9.3 Records will be retained in accordance with CCE's financial and governance policies.

10. Monitoring and Review

10.1 The Treasurer is responsible for monitoring the effectiveness of this policy, with oversight from the Trustees.
10.2 This policy will be reviewed periodically and updated as necessary.
10.3 Feedback on this policy is welcomed and should be directed to the Treasurer or Chair of Trustees.
10.4 This policy does not form part of any contract of employment and may be amended at any time by CCE.

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