



PROCEDURAL POLICY FOR TRUSTEES and COMMITTEE MEMBERS ETHICAL PRACTICES POLICY

It is the policy of the Diocese of Southwark to conduct our business transactions in an honest and ethical manner. Two of our core values are Transparent Accountability and Effective Stewardship of Resources. These should be reflected in the way we conduct the business of the Diocese, and in the way that we behave when working towards the aims of the Diocese. We apply a zero-tolerance approach to bribery and corruption at every level. This policy provides guidance in accordance with the Bribery Act 2010 but if you are concerned about any business dealing, irrespective of the Act, you should report this immediately to the Diocesan Secretary.

This policy covers 3 main areas:

1. Trustee Declaration of Eligibility and Responsibility, and Conflicts of Interests
2. Acceptance of Gifts and Hospitality
3. Bribery

SCOPE

This policy applies to all individuals undertaking work on behalf of the Diocese, as Trustees and Committee members. The type of work being carried out may be in a paid, or voluntary capacity.

It also applies to third parties. In this policy, third party means any individual or organisation you come into contact with during the course of your work, and includes actual and potential suppliers and contractors, business contacts, agents, advisers, and government and public bodies, including their advisors, representatives and officials, politicians and political parties.

SUMMARY

The main points that Trustees and Committee members working for the Diocese should be aware of:

- Make an annual declaration of eligibility, responsibility and conflicts of interest, and inform the Diocesan Secretary of any changes during a year
- Do not accept bribes or accept gifts that may be considered as bribes.
- All gifts, other than those of nominal value, must be handed in to the Director of Human Resources for recording in the Gifts and Hospitality Register
- Gifts will be sold or donated to an auction in aid of charity.
- Do not encourage gifts and hospitality to be given, but accept where it is appropriate to do so, or would otherwise cause offence.
- All people covered by this policy must raise any concerns about actual or potential bribery, or breaches of this policy, immediately

1. Trustee declaration of eligibility

- 1.1. All Trustees and committee members must complete make an annual statement of eligibility, responsibility and conflicts of interest, using the form in Appendix A.

2. Conflicts of interests

- 2.1. Every Trustee or Committee member for the Diocese, has a duty to avoid business, financial or other direct or indirect interests involving relationships or transactions, which conflict with the interests of the Diocese, or which divides his or her loyalty to the Diocese, or which may adversely impact on the Diocese. Any activity or relationship which even appears to present such a conflict must be disclosed to the Diocesan Secretary. It will then be determined whether the activity is unethical or improper, compromises integrity or is detrimental to the reputation and standing of the Diocese.
- 2.2. All Trustees or Committee Members must make a declaration of potential conflicts of interest on commencement of their work, and then annually, including where they have no known interests - see attached form at Appendix A.
- 2.3. Where interests have been declared, the Diocesan Secretary and / or Chair of the DCT, will determine whether there is:
 - i. no conflict of interest.
 - ii. a conflict of interest that is judged to be so marginal that it requires no control measures
 - iii. a conflict of interest that can be managed with appropriate control measures.
 - iv. a conflict of interest that will require the interest or the transaction to end.
- 2.4. The Guidelines attached at Appendix B, provide examples of the interests that should be disclosed.

3. GIFTS AND HOSPITALITY

- 3.1. The aim of this policy is not to prohibit normal and appropriate hospitality being given to or to be received from third parties. Gifts or hospitality can be received where it may cause offence not to do so, e.g. accepting the offer of refreshments prior to, or during a meeting, or in personal recognition of excellent work, e.g. as a token of appreciation from a parish to an individual, such as a bunch of flowers, or a bottle of wine. Gifts or hospitality must not however, be given or received with the intention of influencing a third party to provide a business or personal advantage.
- 3.2. All Trustees and Committee Members, must declare and make a written record of all hospitality or gifts accepted or offered in the Gift and Hospitality register, held with the Director of HR, and ensure that all expenses claims relating to hospitality, gifts or expenses incurred are submitted in accordance with the expenses policy and specifically record the reason for the expenditure.
- 3.3. The Diocese will keep financial records which will evidence the business reason for making payments to third parties.

Where a gift is made, or hospitality provided, you should ensure that:

- You consider the reason for it being given, and whether it is appropriate in terms of type, value and timing; For example, in the UK it is customary for small gifts to be given at Christmas;
- It is given openly, not secretly; and it is not offered to or accepted from government officials or representatives, or politicians or political parties, without the prior approval of the Diocesan Secretary
- You make a record in the Gifts and Hospitality book, of any gift or hospitality received
 - Gifts that are given as genuine token of thanks and appreciation for a particular event or piece of work may be kept by the individual, but must be recorded, eg a bunch of flowers, bottle of wine, chocolates.
 - Gifts that are given, particularly by contractors, because it's customary to do so, e.g provision of gifts at Christmas, must be recorded and handed in for auction or selling for a charity.
 - Gifts of cash or a cash equivalent (such as gift certificates or vouchers) must be handed in;

Gifts and hospitality from third parties with a value, or anticipated value, of over £50 require the prior approval of the Diocesan Secretary.

4. BRIBERY

- 4.1. A bribe is an inducement or reward offered, promised or provided in order to gain any commercial, contractual, regulatory or personal advantage. A bribe goes beyond the scope of what may be considered acceptable practice in the giving and receiving of gifts and hospitality. This may include, for example, offering a potential client tickets to a major sporting events, but only if they agree to make donations to the Diocese of Southwark.
- 4.2. Bribes may not be obvious. For instance, if a supplier gives your nephew a job, but makes it clear that in return they expect you to use your influence at the Diocese of Southwark for their benefit, this would be unlawful. It would also be an offence to arrange to pay an additional amount to an employee of another organisation in order to speed up, or override an administrative process or to accept a gift from a third party - such as vouchers or theatre tickets - in return for your influence.
- 4.3. It is not acceptable for you (or someone on your behalf):
 - To 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;
 - Accept payment from a third party that you know or suspect is offered with the expectation that it will obtain a business advantage for them or a business advantage will be provided by the Diocese of Southwark in return;
 - Accept a gift or hospitality from a third party if you know or suspect that it is offered or provided with an expectation of a business advantage;
 - Threaten or retaliate against another worker who has refused to commit a bribery offence or who has raised concerns under this policy; or
 - Engage in any activity that might lead to a breach of this policy.

5. OUR RESPONSIBILITIES

5.1. The Diocese will ensure that all Trustees and Committee Members read, understand and comply with this policy without fear of reprisal. The policy will be communicated as part of the induction process for Trustees and Committee Members. The prevention, detection and reporting of unethical business practices are the responsibility of all those working for the Diocese of Southwark.

6. YOUR RESPONSIBILITIES

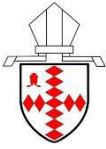
6.1. The following circumstances are considered to be the areas where risks are most likely and which may raise concerns under various anti-bribery and anti-corruption laws. The list is not intended to be exhaustive and is for illustrative purposes only.

- You become aware that a third party engages in, or has been accused of engaging in, improper business practices;
- 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;
- A third party demands lavish entertainment or gifts before commencing or continuing contractual negotiations or provision of services;
- You receive an invoice from a third party that appears to be non-standard or customised;
- You are offered an unusually generous gift or offered lavish hospitality by a third party.

7. RAISING CONCERNS

7.1. All Trustees and Committee Members will be encouraged to raise concerns without fear of reprisal about any issue or suspicion of malpractice at the earliest possible stage, or if you are offered a bribe by a third party, are asked to make one, or suspect that this may happen in the future. If you are unsure whether a particular act constitutes bribery or corruption, or if you have any other queries, these should be raised with the Diocesan Secretary.

7.2. The Diocese of Southwark encourages openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. The Diocese is committed to ensuring no one suffers any detriment or unfavourable treatment as a result of refusing to take part in bribery or corruption, or because they report something in good faith. If you believe you have received any such treatment, you should raise the issue initially with the Diocesan Secretary.



Trustees and Committee Members Declarations of Eligibility, Responsibility and Conflicts of Interest

Name.....

Role in the organisation.....

Declaration of Eligibility and Responsibility

I undertake to fulfil my responsibilities and duties as a trustee of the SLCF&SDBF in good faith and in accordance with the law and within objects of the charity.

I declare that I am not disqualified from acting as a charity trustee and that:

- I am not an undischarged bankrupt.
- I have not been convicted of an offence involving deception or dishonesty (or any such conviction is legally regarded as spent).
- I have not been removed from serving as a charity trustee, or have been stopped from acting in a management position within a charity.
- I have not been disqualified from serving as a company director.
- I do not have any financial or other interests in conflict with those of the SLCF&SDBF (either in person or through family, employment or business connections) except those which I have formally notified in the conflict of interest statement below. I will specifically notify any such interest at any meeting where trustees/committee members are required to make a decision which affects my personal interests, and I will absent myself entirely from any decision on the matter and not involve myself/vote on it
- In light of the above, I am not disqualified from acting as a charity trustee.

Conflict of Interest Statement

Trustees and Committee Members

Please tick those statements that apply.

1. Interests relevant to working for the Diocese (other paid employment, voluntary positions, or licenced work)

a)	No interest - I wish to confirm that I have no other relevant interests that could conflict with my role as a Trustee / Committee Member; or	<input type="checkbox"/>
b)	I am office-holder with the Diocese of Southwark in the position of _____. I wish to confirm that I have no other relevant interests that could conflict with my role as a Trustee / Committee Member; or	<input type="checkbox"/>
c)	I list in the table of interests below the interest that could conflict with my position as a Trustee / Committee Member.	<input type="checkbox"/>

2. Business Transactions

a)	No Interest - I wish to confirm that to the best of my knowledge I and my close family have had no business dealings or other significant financial transactions with the SLCF&SDBF in the last financial year	<input type="checkbox"/>
b)	I list in the table of interests below the names of my close family and wish to declare the following business dealings or other significant financial transactions with the SLCF&SDBF	<input type="checkbox"/>
c)	I list in the table of interests below the names of my close family and I wish to declare interests with significant influence within the following named organisations which have had business dealings or other significant financial transactions with SLCF&SDBF during the year, listed below.	<input type="checkbox"/>

3. Employment / Office-Holding Relationships

a)	No interest - I wish to confirm that I have no close family member who is also an employee, an office-holder or other person working for the Diocese of Southwark	<input type="checkbox"/>
b)	I list in the table of interests below the close family members who are also employees of the SLCF&SDBF, office-holders, or other persons working for the Diocese of Southwark	<input type="checkbox"/>

List of Interests

Name of individual or organisation	Nature of the interest	Further details

I undertake to inform the Diocesan Secretary should any of the above circumstances change.

Signed:

Date:

Name:

DECLARATIONS OF INTEREST - GUIDELINES

Confidential Statement - seen only by Diocesan Secretary & Director of HR - not published for public disclosure

Other Relevant Interests

Trustees and Committee Members who work for the Diocese are often engaged in a number of roles connected to the Diocese.

Examples include;

- Membership of their church's PCC; including Parish Treasurer, Churchwarden, PCC Secretary.
- Parish Safeguarding Officer
- Membership of deanery synod, or other role within a deanery.
- Lay Reader / SPA or other licensed ministry.
- Churchwarden
- Voluntary Work - Trustee of a charity; or voluntary work where there is a direct connection to the Diocese.
- School Governor
- Other public offices - eg, Magistrate, Councillor, etc
- Other paid employment
- Authorised Listener
- Non-Executive Director or Trustee of:
 - i) A public body exercising functions of a public nature
 - ii) A company, industrial and provident society, charity or body directed to charitable purposes
 - iii) A body whose principal purpose includes the influence of public opinion or public policy

Business Transactions

In order to show demonstrate ethical business practices, it's important that we declare any interests in business transactions that take place with the Diocese. Examples include;

- Close family members being employees or directors of businesses from whom the Diocese purchases goods and services.
- Personally, or close family members, being a caretaker of a property owned by the Diocese
- Personally, or close family members, being a tenant of a property owned by the Diocese

Employment Relationships

To ensure that there are appropriate checks and balances in procedures, particularly those involving financial transactions, it's important to list any close family members who are also employees of the SLCF&SDBF, or work for the Diocese of Southwark in any capacity.