



Somewhere to Go Ltd

St John's Church Hall, 4a Boulevard, Weston-super-Mare, BS23 1NA

April 2025

G11 Anti-Bribery Policy - V.2

Somewhere To Go Ltd is a charity with the aim: to relieve poverty and distress among the most disadvantaged in the community, by providing a space where people can feel welcome and comfortable and create an environment which will enhance self worth & self esteem. To offer nourishing food, clothing; to facilitate access to medical & welfare services; help with housing and benefits.

Responsibility

The Board of Trustees has overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it.

It is the responsibility of line managers to communicate the requirements of this policy and procedure to their employees. All staff including volunteers must comply with this policy and other associated policies and procedures. It is the staff members responsibility to ensure that they have read and understood all the relevant policies and procedures and if for any reason they are unclear they seek the guidance of their line manager.

This policy will enable Somewhere to Go to demonstrate its commitment to keeping safe the vulnerable adults with whom it works.

Scope

This policy applies to all Somewhere To Go Ltd staff and volunteers working in all properties owned or managed by Somewhere To Go Ltd, who are supporting or helping to deliver Somewhere To Go services.

This policy applies to all of the activities of Somewhere To Go Ltd. For partners, joint ventures and suppliers, Somewhere To Go Ltd will seek to promote the adoption of policies consistent with the principles set out in this policy.

Within Somewhere To Go Ltd, the responsibility to control the risk of bribery occurring resides at all levels of the organisation. It does not rest solely within Finance and assurance functions, but in all faculties, professional services, business units and corporate functions.

Queries

If there are any queries relating to this policy please contact the Board of Trustees.

Policy statement

Bribery is a criminal offence. It exposes Somewhere To Go Ltd to the risk of prosecution, fines and imprisonment, as well as endangering the reputation of Somewhere To Go Ltd. We do not, and will

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not, pay bribes or offer improper inducements to anyone for any purpose, nor do we, or will we, accept bribes or improper inducements.

To use a third party as a conduit to channel bribes to others is a criminal offence. We do not, and will not, engage indirectly in or otherwise encourage bribery.

We are committed to the prevention, deterrence and detection of bribery. We have zero-tolerance towards bribery. We aim to maintain anti-bribery compliance as 'business as usual', rather than as a one-off exercise.

Objective of this policy

This policy provides a coherent and consistent framework to enable the staff and volunteers of Somewhere To Go Ltd to understand and implement arrangements enabling compliance. In conjunction with related policies and key documents, it will also enable staff and volunteers to identify and effectively report a potential breach.

We require that all personnel, including those permanently employed, temporary agency staff and contractors:

- Act honestly and with integrity at all times and to safeguard the resources of Somewhere To Go Ltd for which they are responsible
- Comply with the spirit, as well as the letter, of the laws and regulations of all jurisdictions in which the organisation operates, in respect of the lawful and responsible conduct of activities.
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Somewhere To Go Ltd's commitment to action

Somewhere To Go Ltd commits to:

- Setting out a clear anti-bribery policy and keeping it up to date
- Making all staff and volunteers aware of their responsibilities to adhere strictly to this policy at all times
- Training all staff and volunteers so that they can recognise and avoid the use of bribery by themselves and others
- Encouraging all staff and volunteers to be vigilant and to report any suspicions of bribery, providing them with suitable channels of communication and ensuring sensitive information is treated appropriately
- Rigorously investigating instances of alleged bribery and assisting police and other appropriate authorities in any resultant prosecution
- Taking firm and rigorous action against any individual(s) involved in bribery
- Provide information to all staff and volunteers to report breaches and suspected breaches of this policy
- Include appropriate clauses in contracts to prevent bribery.

Bribery

Definitions

For the purpose of this policy, bribery is defined as: an inducement or reward offered, promised or provided to gain personal, commercial, regulatory or contractual advantage.

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The Bribery Act 2010 (“the Act”)

There are four key offences under the Act:

1. Bribery of another person (section 1)
2. Accepting a bribe (section 2)
3. Bribing a foreign official (section 6)
4. Failing to prevent bribery (section 7).

The Act makes it an offence to offer, promise or give a bribe (section 1). It also makes it an offence to directly or indirectly request, agree to receive, or accept a bribe (section 2).

Section 6 of the Act creates a separate offence of bribing a foreign official with the intention of obtaining or retaining business or an advantage in the conduct of business.

There is also a corporate offence under section 7 of failure by a commercial organisation to prevent bribery that is intended to obtain or retain business, or an advantage in the conduct of business, for the organisation. An organization will have a defence to this corporate offence if it can show that it had in place adequate procedures designed to prevent bribery by or of persons associated with the organisation.

Somewhere To Go Ltd Procedures

Proportionate Procedures

Somewhere To Go Ltd’s procedures to prevent bribery by persons associated with it are proportionate to the bribery risks it faces and to the nature, scale and complexity of the activities of Somewhere To Go Ltd.

Top-level Commitment

The Board of Trustees are committed to preventing bribery by persons associated with it. Bribery is never acceptable.

Risk Assessment

Somewhere To Go Ltd assesses the nature and extent of its exposure to potential external and internal risks of bribery on its behalf by persons associated with it. The assessment is periodic, informed and documented. It includes financial risks but also other risks such as reputational damage.

Due Diligence

Somewhere To Go Ltd applies due diligence procedures, taking a proportionate and risk based approach, in respect of persons who perform or will perform services for or on behalf of the University, in order to mitigate identified bribery risks.

Communication (including training)

Somewhere To Go Ltd seeks to ensure that its bribery prevention policies and procedures are embedded and understood throughout the University through internal and external communication, including training that is proportionate to the risks it faces.

Monitoring and Review

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Somewhere To Go Ltd monitors and reviews procedures designed to prevent bribery by persons associated with it and makes improvements where necessary.

This organisation is committed to proportional implementation of these principles.

Penalties

An individual guilty of an offence under sections 1, 2 or 6 is liable:

- On conviction in a Magistrates Court, to imprisonment for a maximum term of 12 months (six months in Northern Ireland), or to a fine not exceeding £5,000, or to both
- On conviction in a crown court, to imprisonment for a maximum term of ten years, or to an unlimited fine, or both.

Somewhere To Go Ltd is liable for these fines and if guilty of an offence under section 7 is liable to an unlimited fine.

Bribery is not tolerated

It is unacceptable 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
- Give, promise to give, or offer a payment, gift or hospitality to a government official, agent or representative to 'facilitate' or expedite a routine procedure
- 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
- Accept a gift or hospitality from a third party if you know or suspect that it is offered or provided with an expectation that a business advantage will be provided by us in return
- Retaliate against or threaten a person who has refused to commit a bribery offence or who has raised concerns under this policy
- Engage in activity in breach of this policy.

Facilitation Payments

Facilitation payments are not tolerated and are illegal. Facilitation payments are unofficial payments made to public officials in order to secure or expedite actions.

Gifts and Hospitality

This policy is not meant to change the requirements of the Somewhere To Go Ltd Gifts and Hospitality Policy. This makes it clear that:

- Nominal gifts and hospitality up to a financial value of £10 are acceptable
- Nominal gifts and hospitality with a financial value in excess of £10 should be recorded in the Gifts and Hospitality Register
- Reasonable, proportionate gifts and hospitality made in good faith and that are not lavish are acceptable.

For best practice, staff should inform the respective line manager of gifts and/or hospitality received.

Staff Responsibilities

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The prevention, detection and reporting of bribery and other forms of corruption are the responsibility of all those working for Somewhere To Go Ltd or under its control. All staff and volunteers are required to avoid activity that breaches this policy.

Staff and volunteers must:

- Ensure they have read, understand and comply with this policy
- Raise concerns as soon as possible if they believe or suspect that a conflict with this policy has occurred, or may occur in the future.

As well as the possibility of civil and criminal prosecution, staff that breach this policy will face disciplinary action, which could result in dismissal for gross misconduct.

Third Parties

Somewhere To Go Ltd reserves the right to terminate contractual relationships with third parties if they fail to comply with the terms of this policy.

Raising a Concern

Somewhere To Go Ltd is committed to ensuring that all staff have a safe, reliable, and confidential way of reporting any suspicious activity. Each and every member of staff needs to know how they can raise concerns.

All staff have a responsibility to help detect, prevent and report instances of bribery. If they have a concern regarding a suspected instance of bribery or corruption, please speak up – your information and assistance will help. The sooner you act, the sooner it can be resolved.

There are multiple channels to help raise concerns. Please refer to the Whistleblowing Policy determine your favoured course of action. Preferably the disclosure will be made and resolved internally (e.g. to your head of department).

Concerns can be anonymous. In the event that an incident of bribery, corruption or wrongdoing is reported, the University will act as soon as possible to evaluate the situation.

Staff who refuse to accept or offer a bribe, or those who raise concerns or report wrongdoing, understandably can be worried about the repercussions. Somewhere To Go Ltd aims to encourage openness and will support anyone who raises a genuine concern in good faith under this policy, even if they turn out to be mistaken.

Somewhere To Go Ltd is committed to ensuring that no one suffers detrimental treatment through refusing to take part in bribery or corruption, or because of reporting a concern in good faith.

Policy Review

This policy will be reviewed every 3 years in accordance with government and local publications.

This policy will be reviewed in March 2028.

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