



### Vision Action policy - BRIBERY ACT

Vision Action, formally known as Vision Aid Overseas, is committed to the highest standards of ethical conduct and integrity in its business activities. This policy outlines the organisations position on preventing and prohibiting bribery, in accordance with the Bribery Act 2010. Vision Action will not tolerate any form of bribery by, or of, its employees, agents or consultants or any person or body acting on its behalf. Senior Management is committed to implementing effective measures to prevent, monitor and eliminate bribery.

This policy applies to all employees of the organisation, and to volunteers, temporary workers, consultants, contractors, agents and subsidiaries acting for, or on behalf of Vision Action within the UK and on Vision Action business internationally.

This Vision Action policy also applies to any international / national partners and creates the requirement for appropriate “due diligence” in the selection and monitoring of these Partners.

Every employee and associated person acting for, or on behalf of, the organisation is responsible for maintaining the highest standards of business conduct. Any breach of this policy is likely to constitute a serious disciplinary, contractual and criminal matter for the individual concerned and may cause serious damage to the reputation and standing of Vision Action.

The UK Bribery Act 2010 is in force from 1 July 2011. This policy covers:

- the main areas of liability under the Bribery Act 2010
- the responsibilities of employees and associated persons acting for, or on behalf of, the Organisation
- the consequences of any breaches of this policy

A handwritten signature in black ink, appearing to read "Nicola Chevis", with a horizontal line underneath.

Nicola Chevis

CEO

Updated in March 2021

## Part 1 The Requirement

1.1 The Bribery Act creates a new offence under section 7 which can be committed by commercial and charitable organisations which fail to prevent persons associated with them from committing bribery on their behalf. It is a defence for an organisation to prove that despite a particular case of bribery it nevertheless had adequate procedures in place to prevent persons associated with it from bribing.

1.2 It is therefore a requirement that all staff, Members of the Board, volunteers and members of partner organisations understand the implications of the Bribery Act and acknowledge their responsibilities to Vision Action under the Bribery Act.

## Part 2 The Six Principles of the Act

2.1 Vision Action will comply with the Bribery Act by adopting the 6 general principles set out within the Act. These general principles are outcome-focussed and flexible allowing Vision Action to tailor our procedures to comply with the Act in line with our unique (membership based / volunteer driven) operating environment.

1. Risk Assessment –this is about understanding the risks of bribery to our organisation and keeping this awareness up to date.
2. Top level commitment –Vision Action has a culture which bribery is unacceptable. This message is driven by the CEO, fully endorsed by the Board of Trustees and is clear, unambiguous and regularly made to all staff, volunteers and partners.
3. Due diligence –this is about knowing who we do business with and feeling confident that they maintain the same high ethical standards that we do.
4. Clear, Practical and Accessible Policies and Procedures –this concerns applying them to everyone under our effective control and covering all relevant risks such as, gifts and hospitality, promotional expenses etc
5. Effective implementation –this is about going beyond ‘paper compliance to embedding anti-bribery in Vision Action’s internal controls, recruitment and remuneration policies, operations, communications and training.
6. Monitoring and review –this relates to how Vision Action will audit and review our financial controls that are sensitive to bribery.

### **Part 3 What is Prohibited**

3.1 Vision Action prohibits employees or associated persons (inc volunteers acting under the organisational umbrella), from offering, promising, giving, soliciting or accepting any bribe. The bribe might be cash, a gift, or other inducement to, or from, any person or Organisation, whether a public or government official, official of a state-controlled industry, political party or a private person or organisation, regardless of whether the employee or associated person is situated in the UK.

3.2 The bribe might be made to ensure that a person or Organisation improperly performs duties or functions (for example, by not acting impartially or in good faith or in accordance with their position of trust) to gain any commercial, contractual or regulatory advantage for the Organisation in either obtaining or maintaining Organisation business, or to gain any personal advantage, financial or otherwise, for the individual or anyone connected with the individual.

3.3 This prohibition also applies to indirect contributions, payments or gifts made in any manner as an inducement or reward for improper performance, for example through consultants, contractors, sub-contractors, agents, subagents, sponsors or sub-sponsors, joint-venture partners, advisors, customers, suppliers or other third parties. The prohibition includes organisations which Vision Action seeks to do business with through Partnership Agreements.

### **Part 4 Records**

4.1 Employees, volunteers and associated persons, are required to take particular care to ensure that records are accurately maintained in relation to any programme contracts or business activities, including financial invoices and all payment transactions with clients, suppliers and public officials.

4.2 Due diligence should be undertaken prior to entering into any contract, arrangement or relationship with a potential supplier of services, agent, consultant or representative. This includes overseas partner organisations whom Vision Action may wish to do work with. The responsibility for such due diligence, initially rests with the Development Director who will seek advice off the international Programme Director and Programme Directors.

4.3 Employees and associated persons are required to keep accurate, detailed and up-to-date records of all corporate hospitality, entertainment or gifts accepted or offered. The HQ Finance and Operations Director will maintain a Log of such accepted or offered.

### **Part 5 Corporate entertainment, gifts, hospitality and promotional expenditure**

5.1 Vision Action permits corporate entertainment, gifts, hospitality and promotional expenditure that is undertaken for the purpose of:

- establishing or maintaining good business relationships;
- to improve the image and reputation of Vision Action; provided that it is:

arranged in good faith, and not offered, promised or accepted to secure an advantage for Vision Action, or any of its employees or associated persons or to influence the impartiality of the recipient.

5.2 Vision Action will authorise only reasonable, appropriate and proportionate entertainment and promotional expenditure. This principle applies to employees, volunteers and associated persons.

## **Part 6 Procedure**

6.1 Employees and volunteers and, where relevant, associated persons should submit requests for proposed hospitality and promotional expenditure well in advance of proposed dates to either the CEO (for HQ Staff), or the International Programmes Director (through the relevant Programme Director).

6.2 Employees and volunteers are required to set out in writing:

- the objective of the proposed entertainment or expenditure;
- the identity of those who will be attending;
- the organisation that they represent; and
- details and rationale of the proposed activity.

6.3 Vision Action will approve business entertainment proposals only if they demonstrate a clear business objective and are appropriate for the nature of the business relationship. The organisation will not approve business entertainment where it considers that a conflict of interest may arise or where it could be perceived that undue influence or a particular business benefit was being sought (for example, prior to a contracting exercise).

6.4 Any gifts, rewards or entertainment received from individuals, public officials, suppliers or other business contacts should be reported immediately (this does NOT include volunteer donations to the organisation). In certain circumstances, it may not be appropriate to retain such gifts and employees and associated persons may be asked to return the gifts to the sender, for example, where there could be a real or perceived conflict of interest. The receipt of such gifts etc will be recorded in the Hospitality log maintained by the Finance and Operations Director.

6.5 As a general rule, small tokens of appreciation, such as flowers or a bottle of wine, may be retained by employees / volunteers.

## **Part 7 Reporting Suspected Bribery**

7.1 Vision Action depends on its employees, volunteers and associated persons to ensure that the highest standards of ethical conduct are maintained in all its business dealings. All are requested to assist the Charity and to remain vigilant in preventing, detecting and reporting bribery. Issues that should be reported include:

- any suspected or actual attempts at bribery;
- concerns that other employees, volunteers or associated persons may be being
- bribed; or
- concerns that other employees, volunteers or associated persons may be bribing third parties, such as individuals or government officials.

7.2 Employees or associated persons who report instances of bribery in good faith will be supported by Vision Action.

7.3 Please ensure the Vision Action's Whistle-Blowing Policy is read in conjunction with this policy, in terms of extra guidance provided in reporting suspected bribery.

## **Part 8 Action by Vision Action**

8.1 The Charity will fully investigate any instances of alleged or suspected bribery. Employees suspected of bribery may be suspended from their duties (on contractual pay) while the investigation is being carried out. Volunteers will not be selected for further Projects whilst such an investigation is conducted. Vision Action will invoke its disciplinary procedures where any employee is suspected of bribery, and proven allegations may result in a finding of gross misconduct and immediate dismissal.

8.2 The organisation may terminate the contracts of any associated persons, including consultants or other workers who act for, or on behalf of, the organisation who are found to have breached this policy. Vision Action may also report any matter to the relevant authorities, including the Director of Public Prosecutions, Serious Fraud Office, Revenue and Customs Prosecutions Office and the police.

8.3 Staff of Partner Organisations who are proved to be in contravention of this Policy will be expected to be subjected to similar disciplinary action, failure to do so may result in Vision Action terminating without notice, the Partnership.

## **Part 9 Communication**

9.1 This Policy is to be signed by all Programme Directors and signed off by them that they understand the content. (Annex A). The Programme directors will pass this Policy to their Country Representatives, who must also acknowledge receipt and understanding.

9.2 HQ Programme Officer will pass this policy to each Team Leader who must acknowledge receipt and understanding.

9.3 Training and briefing on this Policy will form part of all TLDP and VDP events and be a mandatory part of each Programme Conference.

9.4 Compliance to the Act and the review of this Policy will be tabled annually by the Board of Trustees.

## **Part 10 Monitoring and Evaluation**

10.1 The Executive will monitor and review the implementation of this policy and related procedures on a regular basis, including reviews of internal financial systems, expenses, corporate hospitality, gifts and entertainment policies.

10.2 Vision Action reserves the right to amend and update this policy as required.

10.3 For the avoidance of doubt, this policy does not form part of employees' Contract of Employment.



ANNEX A TO ANTI BRIBERY POLICY

BRIBERY ACT COMPLIANCE

I have received and been briefed on the Vision Action Policy on the UK Bribery Act Policy and fully understand my responsibilities to comply with and promote the Policy.

Signed	
Name	
Position within Vision Action	
Date	