

The background of the page is a repeating pattern of stylized, grey, feather-like leaves or branches. These elements are scattered across the white background, with some appearing larger and more detailed than others. The pattern is consistent throughout the page, framing a central blue box.

Bribery and Corruption Policy

St James Clitheroe

June 2021

Preventing bribery and corruption in St James Church, Clitheroe

1. The Church is required by God to foster relationships of the utmost integrity, truthfulness and trustworthiness. The PCC of St James Church, Clitheroe, and those acting on its behalf, does not, and will not, pay bribes or offer improper inducements to anyone for any purpose, nor does it or will it, accept bribes or improper inducements or use a third party as a conduit to channel bribes.
2. The PCC is committed to the prevention, deterrence and detection of bribery.
3. This policy applies to all of the PCC's activities and covers all personnel, including those permanently employed, temporary staff, contractors, trustees, agents, volunteers and consultants.

WHAT IS BRIBERY?

4. 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, kickback, gifts, loans, fees, hospitality, services, discounts, the award of a contract, or any other commercial or personal advantage or benefit.
5. **"Bribery"** includes offering, promising, giving, accepting or seeking a bribe.
6. **All forms of Bribery are strictly prohibited.** If you are unsure about whether a particular act constitutes bribery, raise it with the Operations Manager or your line manager.
7. Specifically, you **must not**:
 - i. 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;
 - ii. 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;
 - iii. give or offer any payment (sometimes called a facilitation payment) to a government official in any country to facilitate or speed up a routine or necessary procedure (even if these payments are common in certain countries); or
 - iv. 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.

GIFTS AND HOSPITALITY

8. This policy does not prohibit giving or accepting reasonable and appropriate hospitality (including meals, drinks, or other activities) for legitimate purposes such as building relationships.
9. Gifts must be of an appropriate type and value depending on the circumstances and taking account of the reason for the gift.

10. Gifts or hospitality will be inappropriate if they are unduly lavish or extravagant, or could be seen as an inducement or reward for any preferential treatment (for example, during contractual negotiations or a tender process).
11. Financial gifts should be declared by notifying the PCC Treasurer who will keep a register of gifts received.

WHO IS RESPONSIBLE FOR THIS POLICY?

12. The prevention, detection and reporting of bribery and corruption are the responsibility of all those working for the PCC or as part of it. All staff are required to avoid activity that breaches this policy.
13. You must:
 - i. Ensure that you read, understand and comply with this policy.
 - ii. Raise concerns as soon as possible if you believe or suspect that a conflict with this policy has occurred or may occur in the future.
14. As well as the possibility of civil or criminal prosecution, staff that breach this policy will face disciplinary action, which may result in dismissal for gross misconduct.
15. This policy will be reviewed regularly and we may amend it at any time to update with best practices and processes.

RAISING A CONCERN

16. If you are offered a bribe, or are asked to make one, or if you suspect that any bribery, corruption or other breach of this policy has occurred or may occur in the future, you must notify your line manager or PCC Treasurer as soon as possible.
17. You are encouraged to raise concerns about any issue or suspicion of bribery in any parts of our business or supply chains at the earliest possible stage.
18. If you are unsure about whether a particular act constitutes any of the various forms of bribery, raise it with your manager or the PCC Treasurer.
19. We aim to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. We are committed to ensuring no one suffers any detrimental treatment as a result of reporting in good faith their suspicion that bribery of whatever form is or may be taking place in any part of our own business or in any of our supply chains. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern.