

Gifts and Hospitality, Anti-Corruption and Bribery Policy

1. Introduction

Response Ability Theatre (hereafter referred to as RAT) is committed to carrying out its business fairly, honestly and openly. We believe that we should not receive benefits of any kind from third parties which might reasonably be seen to compromise our personal judgement and integrity.

This policy applies to all persons working for us or on our behalf, including trustees, employees at all levels whether permanent or temporary, directors, officers, agency workers, casual workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives and business partners (collectively referred to as RAT colleagues). This procedure does not form part of any employee's contract of employment. It may be amended at any time and we may depart from it depending on the circumstances of any case. The policy applies to all processes and to any dealings with any clients, partners and suppliers.

2. Aim

RAT values its reputation for ethical behaviour and financial probity and reliability. We recognise that any involvement in bribery is both illegal and will adversely impact our image and reputation.

The aim of this policy is to help employees understand what to do if they are offered gifts and hospitality, and to provide a clear framework to ensure that all relevant parties understand what constitutes bribery, corruption, or exposes the charity to accusations (founded or unfounded) of unethical or unlawful behaviour.

3. Bribery

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, gifts, loans, fees, hospitality, services, discounts, the award of a contract or any other advantage or benefit.

Bribery includes offering, promising, giving, accepting or seeking a bribe.

All staff, volunteers and other parties as set out in section 1 above have a responsibility to help in the prevention, detection and reporting of bribery.

Specifically, you must not:

- 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
- 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
- give or offer any payment (sometimes called a facilitation payment) to a government or local council official in any country to facilitate or speed up a routine or necessary procedure
- 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
- knowingly fail to challenge or report suspicions of bribery or corruption.

4. Gifts or donations received by RAT

RAT, in deciding whether to accept or decline a donation or gift, will consider the charity's best overall interest and will not accept donations from donors whose activities appear to be in direct conflict with our charitable aims and objectives.



An employee or any member of their family/friends should not, directly or through others, solicit or accept money, gifts, hospitality or anything else that could influence or reasonably give the appearance of influencing the relationship with that organisation or individual. Unless you have been informed otherwise you may accept a gift to a nominal value of £50, such as a box of chocolates or biscuits, a marketing/advertising novelty or small seasonal gift when it is customarily offered to others having a similar relationship with that individual or organisation. The gift may be repurposed and used for fundraising purposes.

RAT will not take gifts from organisations or individuals who participate in activities which:

- could cause detriment to the charity's reputation
- will disproportionately decrease the amount of donations to further the work of the charity
- undermine our vision and values
- are associated with unsuitable products, corporate and individuals (e.g. arms dealings)
- are from individuals, groups or organisations which are known to take advantage of vulnerable people
- are from unknown sources of funding. RAT will take reasonable steps to determine the ultimate source of funding for each gift and satisfy itself that the funds do not derive, directly or indirectly, from activity that was or is illegal.
- potentially harm our relationships with other donors, service users, stakeholders or volunteers
- expose us to undue adverse publicity or reputational risk
- require unacceptable expenditure or additional charity resources.

If supporters wish to make a donation to a specific area of RAT's work then we will request a written instruction to this effect with their donation. RAT will always respect this. If RAT is unable to accept the request for the specified donation and the sponsor does not want the donation used in any other way RAT will refund the donation.

Refusals of donations or gifts

If a gift is received which may not be acceptable under the terms of this policy, it will be researched further and the matter will be referred to the board with the necessary information regarding the donation.

Donation or Gift processing

All donations or gifts must be conveyed to the CEO at the earliest possible opportunity accompanied by all original correspondence pertaining to the donation or gift, which will be filed. A receipt of donation form should also be completed with the donor, including their full name, contact details and address.

On receipt, all donations should be processed through the donation record system.

It shall be the responsibility of any staff member or trustee to inform the CEO when a donation or gift is received. It is the responsibility of the CEO to record and ensure acknowledgement of receipt of all donations and gifts. Supporter anonymity will be protected whenever specified.

When donations or gifts are received, a completed Receipt of Donations form should accompany them. The CEO is responsible for allocating the donation to the appropriate fund as described on the form. The following information must be included on the sheet:



- The donor's name must be provided. If the gift is from other than an individual (i.e. corporation, organisation, charitable trust, etc.) a contact name and should be reported in addition to that of the company.
- Email address and/or telephone number of the donor
- Date of gift received
- Other special instructions (i.e. is this a specified or unspecified donation)

Upon receipt of a unique donation (i.e. restricted [for a specific purpose] or unrestricted [for any charitable purpose] donation) and the appropriate supporting documents, the CEO will record the donation and send acknowledgement of receipt to the donor. Where appropriate, the CEO will ascertain if the donor is happy for their donation to be acknowledged publicly (e.g. on the RAT website, social media and annual report).

Gifts in memoriam

Donations or gifts to honour, in remembrance or otherwise recognise individuals, whether the donor is living or by bequest, will be received by the CEO. It is the RAT policy not only to receive such gifts but also to encourage efforts to remember and honour donors.

5. Suppliers - Gifts and Hospitality

In broad terms any gifts received as a result of interaction with suppliers should be of nominal value or received for the organisation as a whole. The following examples outline what kind of gifts may be acceptable, but good judgement should be exercised in all circumstances.

Example 1: A gift comprising a tangible object worth less than £50 received from an established supplier is acceptable (e.g. a Christmas hamper), a cash gift of £100 or more is not acceptable.

Example 2: A restaurant meal with an established supplier is acceptable, visiting nightclubs and other late night establishments with suppliers is not acceptable.

Example 3: Accompanying an existing supplier to the hospitality part of a sporting event is acceptable.

6. Giving gifts and hospitality

Staff, volunteers, and all others as set out in section 1, or any member of their family/friends should not, directly or through others, offer or give any money, gifts, hospitality or other thing of value to an official, employee or representative of any supplier, customer, funder, statutory body or any other organisation, if doing so could reasonably give the appearance of influencing the organisation's or individual's relationship with RAT.

Staff, volunteers and all others as set out in above, may, with management approval, give gifts of a nominal value up to £50, or provide meals, provided that the expenses are kept within a reasonable and approved level. Gifts must be of an appropriate type and value depending on the circumstances and taking account of the reason for the gift. Gifts must not include cash, or be given in secret. Gifts must be given in the name of RAT, not the staff member's name.

7. Political contributions

We do not make donations, whether in cash or kind, in support of any political parties or candidates, as this can be perceived as an attempt to gain an advantage or to exert influence.

8. Record-Keeping



All hospitality and gifts given or received must be entered into the Gifts Register. All expenses claims relating to hospitality, gifts or payments must be recorded along with the reason for the expenditure. Accounts must not be kept “off-book” to facilitate or conceal improper payments.

9. How to raise a concern

If any member of staff, volunteer or any other party as set out above, is concerned about a gift that has been given or offered which may represent a possible breach of these rules, they should approach the CEO or the Chair of the Board, who will treat any such information in confidence unless it needs to be reported.

Staff and volunteers should also consult their manager if they have any questions about the interpretation and application of this policy.

10. Measurement and Monitoring

Overall responsibility for monitoring the effectiveness of this policy lies with the CEO and the Trustees. All staff, volunteers and trustees are committed to implementing this policy.

RAT will comply with the requirements of the General Data Protection Regulation and Data Protection Act 2018 in the way that any data is stored and used.

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