Anti-bribery policy

Introduction

The British Science Association is committed to the highest standards of ethical conduct and integrity in its business activities. This policy outlines the Association’s position on preventing and prohibiting bribery, in accordance with the Bribery Act 2010. The Association will not tolerate any form of bribery by, or of, its employees, agents or consultants or any person or body acting on its behalf.

The Chief Executive and Directors are committed to implementing effective measures to prevent, monitor and eliminate bribery.

Scope of this policy

This policy applies to all employees and officers of the Association, and to temporary workers, consultants, contractors, agents and subsidiaries acting for, or on behalf of, the Association ("associated persons") within the UK and overseas. Every employee and associated person acting for, or on behalf of, the Association 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 the Association.

The Association may also face criminal liability for unlawful actions taken by its employees or associated persons under the Bribery Act 2010. All employees and associated persons are required to familiarise themselves and comply with this policy, including any future updates that may be issued from time to time by the Association.

Bribery Act 2010

The Association is committed to complying with the Bribery Act 2010 in its business activities in the UK (and overseas).

Under the Bribery Act 2010, a bribe is a financial or other type of advantage that is offered or requested with the:

- intention of inducing or rewarding improper performance of a function or activity; or
- knowledge or belief that accepting such a reward would constitute the improper performance of such a function or activity.

A relevant function or activity includes public, state or business activities or any activity performed in the course of a person's employment, or on behalf of another organisation or individual, where the person performing that activity is expected to perform it in good faith, impartially, or in accordance with a position of trust.

A criminal offence will be committed under the Bribery Act 2010 if:

- an employee or associated person acting for, or on behalf of, the Association offers, promises, gives, requests, receives or agrees to receive bribes; or
- an employee or associated person acting for, or on behalf of, the Association offers, promises or gives a bribe to a foreign public official with the intention of influencing that
official in the performance of his/her duties (where local law does not permit or require such influence); and
• the Association does not have the defence that it has adequate procedures in place to prevent bribery by its employees or associated persons.

All employees and associated persons are required to comply with this policy, in accordance with the Bribery Act 2010.

What is prohibited?
The Association prohibits employees or associated persons 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 or overseas. 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 Association in either obtaining or maintaining Association business, or to gain any personal advantage, financial or otherwise, for the individual or anyone connected with the individual.

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 or sub-contractors, agents or sub-agents, sponsors or sub-sponsors, joint-venture partners, advisors, customers, suppliers or other third parties.

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

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.

Facilitation payments

Principle
The Association prohibits its employees or associated persons from making or accepting any facilitation payments. These are payments made to government officials for carrying out or speeding up routine procedures. Facilitation payments are distinct from an official, publicly available fast-track process. Facilitation payments, or offers of such payments, will constitute a criminal offence by both the individual concerned and the Association under the Bribery Act 2010.

Procedure
Where a public official has requested a payment, employees or associated persons should ask for further details of the purpose and nature of the payment in writing. If the public official refuses to give these, this should be reported immediately to the Chief Executive.

If the public official provides written details, the Chief Executive will consider the nature of the payment. Legal advice may be sought by the Association.

If it is concluded that the payment is a legitimate fee, for example part of a genuine fast-track process, the Association will authorise the employee to make the payment.
Corporate entertainment, gifts, hospitality and promotional expenditure

Principle

The Association permits corporate entertainment, gifts, hospitality including working lunches and promotional expenditure that is undertaken:

- for the purpose of establishing or maintaining good business relationships;
- to improve the image and reputation of the Association; or
- to present the Association’s goods/services effectively;

provided that it is:

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

The Association will authorise only reasonable, appropriate and proportionate entertainment and promotional expenditure.

This principle applies to employees and associated persons.

Procedure

Employees and, where relevant, associated persons should submit requests for proposed hospitality and promotional expenditure well in advance of proposed dates to the Chief Executive.

Employees are required to set out in writing:

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

Any gifts, rewards or entertainment received or offered from clients, public officials, suppliers or other business contacts should be reported immediately to the Director of Finance who will enter the details into a Register of Gifts Received. In certain circumstances, it may not be appropriate to retain such gifts or be provided with the entertainment and employees and associated persons may be asked to return the gifts to the sender or refuse the entertainment, for example, where there could be a real or perceived conflict of interest. As a general rule, small tokens of appreciation, such as flowers or a bottle of wine, may be retained by employees.

If an employee or associated person wishes to provide gifts to suppliers, clients or other business contacts, prior written approval from the Chief Executive is required, together with details of the intended recipients, reasons for the gift and business objective. These will be authorised only in limited circumstances and will be subject to a cap of £50 per recipient. This does not include profession related gifts e.g. pens, memory sticks etc.

Employees and, where applicable, associated persons must supply records and receipts, in accordance with the Association’s expenses policy.
Reporting suspected bribery

Principle

Employees and associated persons are requested to assist the Association and to remain vigilant in preventing, detecting and reporting bribery.

Employees and associated persons are encouraged to report any concerns that they may have to the Chief Executive as soon as possible. Issues that should be reported include:

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

Employees or associated persons who report instances of bribery in good faith will be supported by the Association. The Association will ensure that the individual is not subjected to detrimental treatment as a consequence of his/her report.

Action by the Association

The Association will fully investigate any instances of alleged or suspected bribery.

The Association 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. The Association will provide all necessary assistance to the relevant authorities in any subsequent prosecution.

Review of procedures and training

The Association communicates its anti-bribery measures to employees via its Staff Handbook, and to external partners via a link to the publication of this document on its website.

The Association reserves the right to amend and update this policy as required. For the avoidance of doubt, this policy does not form part of employees’ contracts of employment.

This policy was last reviewed in August 2020.