

**BRIBERY ACT 2010 – INTRANET NOTICE**

The Bribery Act 2010 received Royal Assent recently.

The purpose of this note is to make staff aware of the Act and its potentially serious consequences.

The Act creates four offences. Any offence under the Act committed by an individual is punishable either by a fine or imprisonment for up to 10 years or both.

The offences that will apply most often are –

Offering, promising or giving a bribe and  
Requesting, agreeing to accept or receiving a bribe.

A bribe need not necessarily involve money - it can be any form of financial or other advantage.

It is important to try to distinguish a bribe from other offers of gifts and hospitality which may be used to try to influence a decision. A bribe is likely to be a far more blatant, recognisable and valuable inducement that is intended to corrupt a person's behaviour. Any acceptance or refusal of what might be considered acceptable gifts or hospitality should always be recorded in the registers that are kept by the various administrative support teams. Further guidance on gifts and hospitality is contained in the employee code of conduct which can be found in the HR Handbook.

If a member of staff is offered or promised a bribe for any reason, firstly the offer should be declined and then the circumstances should be reported to your manager or, if you are a senior manager yourself, to the Head of Finance so that the matter can be investigated and then reported to the appropriate authorities.

It is important that swift action is taken and that as much detail as possible is recorded together with any form of evidence to support the matter.

If you have any queries or concerns about anything to do with the Bribery Act then feel free to contact any member of Internal Audit.