



Scottish Communities Climate Action Network (SCCAN) CIC

Anti-Corruption Policy

1. Our understanding of Bribery and Corruption

1. The Scottish Communities Climate Action Network (SCCAN) is committed to work in an ethical and honest manner, and to establish systems to prevent bribery.
2. We have a zero-tolerance for bribery and corruption and are committed to acting professionally, fairly, and with integrity in all business dealings and relationships.
3. SCCAN is bound by UK laws, including the Bribery Act 2010 and recognises that bribery and corruption are punishable by up to ten years of imprisonment and a fine.
4. Any organisation discovered to have taken part in corrupt activities may be subjected to an unlimited fine and face serious damage to their reputation.

2. Purpose

5. This policy sets out the responsibilities of SCCAN and those who work with us in upholding our zero-tolerance position on bribery and corruption.
6. It guides those working for and volunteering with SCCAN. It helps all to recognise and deal with bribery and corruption issues, and to understand their responsibilities.

3. Who is covered by the policy?

7. This anti-bribery policy applies to all staff (whether employees, consultants, contractors, trainees, seconded staff, home workers, casual workers, interns or agency staff) and volunteering members, or any other person who represents SCCAN and to directors and / or volunteering members at any level.
8. Third-party refers to any individual or organisation we meet and work with. It refers to clients, suppliers, distributors, contacts and government and public bodies – including advisors, representatives and officials, politicians, and public parties.
9. Any arrangements made with a third party must be subject to clear contractual terms, including specific provisions that require the third party to comply with minimum standards and procedures relating to anti-bribery and corruption.

4. Definition of bribery

10. Bribery refers to the act of offering, giving, promising, asking, agreeing, receiving, accepting, or soliciting something of value or of an advantage so as to induce or influence an action or decision.
11. A bribe refers to any inducement, reward, or object / item of value offered to another individual to gain commercial, contractual, regulatory, or personal advantage. Bribery is not limited to the act of offering a bribe. If an individual is on the receiving end of a bribe and they accept it, they are also breaking the law.
12. Bribery is illegal. Representatives must not engage in any form of bribery, whether it be directly, passively, or through a third party. They must not accept bribes and if they are uncertain about whether something is a bribe or a gift or act of hospitality, they must seek advice from the Finance and Admin Weaver (finance@sccan.scot).

4. What is and what is NOT acceptable

13. This section of the policy refers to four areas:

a. Gifts and hospitality

SCCAN accepts normal and appropriate gestures of hospitality and goodwill so long as the giving or receiving of gifts meets the following requirements:

- It is not made with the intention of influencing the party to whom it is given, to obtain or reward the retention of a business advantage, or exchange for benefits.
- It is not made with the suggestion that a return favour is expected.
- It is in compliance with local law.
- It is given in the name of the organisation, not in an individual's name.
- It does not include cash or a cash equivalent (e.g. a voucher or gift certificate).
- It is appropriate for the circumstances (e.g. giving small gifts around Christmas or a small thank you to a company for helping with a large project upon completion).
- It is of an appropriate type and value and given at an appropriate time.
- It is given / received openly, not secretly.
- It is not given to one influential person, with intention of directly influencing them.
- It is not of excessive value (usually in excess of £100).
- It is not offered to, or accepted from, a government official or political party.

Where it is inappropriate to decline the offer of a gift (i.e. when meeting with an individual of a culture who may take offence), the gift may be accepted so long as it is declared to the compliance manager, who will assess the circumstances.

All gifts given and received in excess of £100 should always be reported to the finance and admin weaver, should that happen or upon realisation of the value.

The intention behind a gift being given / received should always be considered. If there is any uncertainty, the advice of the finance and admin weaver should be sought.

b. Facilitation Payments and Kickbacks

SCCAN does not accept facilitation payments at all. These are a form of bribery to influence a public official. They tend to be made by low level officials with the intention of securing or speeding up the performance of a certain duty or action.

SCCAN does not allow kickbacks - typically for a business favour or advantage.

c. Political Contributions

SCCAN will not make donations, whether in cash, kind, or by any other means, to support any political parties or candidates. We recognise this may be perceived as an attempt to gain an improper business advantage.

d. Charitable Contributions

SCCAN accepts (and indeed encourages) the act of donating to charities – whether through services, knowledge, time, or direct financial contributions (cash or otherwise) – and agrees to disclose all charitable contributions it makes.

Employees must be careful to ensure that charitable contributions are not used to facilitate and conceal acts of bribery.

We will ensure that all charitable donations made are legal and ethical under local laws and practices, and that donations are not offered / made without the approval of the compliance manager.

5. Staff and Volunteering Member Responsibilities

14. All representatives of SCCAN must comply with this policy, and with any training or other anti-bribery and corruption information issued by SCCAN.
15. All SCCAN representatives are equally responsible for the prevention, detection, and reporting of bribery and other forms of corruption. Everyone must avoid any activities that could lead to, or imply, a breach of this anti-corruption policy.
16. If you suspect that an instance of bribery or corruption has occurred - or will occur in the future - that breaches this policy, you must tell the risk & compliance manager.
17. If any representative breaches this policy, they will face disciplinary action and could face dismissal for gross misconduct. SCCAN has the right to terminate a contractual relationship with a representative if they breach this policy.

6. What happens if I need to raise a concern?

18. This section of the policy covers 3 areas:

a. How to raise a concern

If you suspect that there is an instance of bribery or corrupt activities occurring in relation to SCCAN, you must immediately raise your concerns. If uncertain about whether an action or behaviour can be considered bribery or corruption, ask a colleague or the risk and compliance manager.

b. What to do if you are a victim of bribery or corruption

You must immediately tell the risk and compliance manager if you are offered a bribe by anyone, if you are asked to make one, if you suspect that you may be bribed or asked to make a bribe, or believe that you are a victim of corrupt activity.

c. Protection

SCCAN respects whistleblowing procedures so any representative can report their concerns swiftly and confidentially.

If you refuse to accept or offer a bribe, or report a concern about potential bribery or corruption, SCCAN understands you may be worried about repercussions. SCCAN will support anyone who raises concerns in good faith under this policy, even if investigation finds that they were mistaken.

SCCAN will ensure that no one suffers any detrimental treatment as a result of refusing to accept or offer a bribe or other corrupt activities or because they reported a concern relating to potential act(s) of bribery or corruption.

Detrimental treatment refers to dismissal, disciplinary action, or unfavourable treatment in relation to the concern the individual raised.

If you have reason to believe you've been subjected to unjust treatment as a result of a concern or refusal to accept a bribe, tell the compliance manager immediately.

7. Training and communication

19. SCCAN will signpost this policy as part of the induction process for all SCCAN core newbies.
20. SCCAN's anti-bribery and corruption policy and zero-tolerance attitude will be clearly communicated to all suppliers, contractors, business partners, and any third-parties as appropriate.
21. SCCAN will provide relevant training to staff and volunteering members etc. where they need to know how to comply with the Bribery Act.

8. Record keeping

22. SCCAN keeps detailed and accurate financial records, and has appropriate internal controls in place to act as evidence for all payments made. We will declare and keep a written record of the amount and reason for hospitality or gifts accepted and given, and understand that gifts and hospitality are subject to review.

9. Monitoring and reviewing

23. SCCAN's risk and compliance manager is responsible for monitoring the effectiveness of this policy and will review its suitability, adequacy, and effectiveness and implementation every three years.
24. Internal control systems and procedures designed to prevent bribery and corruption are subject to regular audits to ensure that they are effective in practice.
25. Any need for improvements will be applied as soon as possible. SCCAN core are encouraged to offer any suggestions for how this policy may be improved. Feedback of this nature should be addressed to the risk and compliance manager.
26. This policy does not form part of a staff contract of employment and SCCAN may amend it at any time so as to improve its effectiveness at combating bribery and corruption.

Document history

Who	Where discussed	Changes / Decisions	Date
KB	Gov & Policies Sub-circle	First draft adapted from www.highspeedtraining.co.uk template	4 Dec 2020

KB	Gov & Policies Sub-circle	Circulated to Board/General Circle for approval / comment [Suggestions for further shortening of draft received by DS]	16 Dec 2020
CIC Bd	Written procedure	Approval in principle	18 Dec 2020
	Governance & Policies Circle	Circulated to Board/General Circle for further feedback - no comments received	11 Jan 2021
	Governance & Policies Circle	Circulated for final approval by email by CIC Board	15 Feb 2021
	CIC Board	Adopted - next Review due in Feb 2024	19 Feb 2021