

The **PIRATE CASTLE**

ANTI-CORRUPTION, FRAUD AND BRIBERY POLICY

Implemented September 2024

Next review by Trustees: September 2025

1. Our commitment

- 1.1 It is our policy to operate the Pirate Castle (the Charity) in an honest and ethical way. We take a zero-tolerance approach to fraud and bribery and are committed to acting professionally, fairly and with integrity.
- 1.2 All forms of bribery, theft and fraud are strictly prohibited. If you are unsure about whether a particular act constitutes bribery, theft or fraud, or if you feel uneasy about something you've heard or seen relating to the Charity, raise it with the General Manager (tim@thepiratecastle.org), the Chair of Trustees (trustees@thepiratecastle.org) or under our whistle blowing policy

2. This policy

- 2.1 This policy applies to all persons working for us or on our behalf in any capacity, including all activity volunteers, employees and our trustees. This policy is not contractual and we may amend it at any time. It will be reviewed, as necessary.
- 2.2 Any employee or volunteer or trustee who breaches this policy may face disciplinary action (employees), or removal from their voluntary role (volunteers and trustees).

3. What behaviour is prohibited?

- 3.1 **Bribe** means a financial or other incentive 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.
- 3.2 **Bribery** includes offering, promising, giving, accepting, or seeking a bribe.
- 3.3 **Fraud** is a deliberate intent to acquire money or goods dishonestly through the falsification of records or documents. Fraud can also be committed verbally through lying or omission.
- 3.4 **Theft** is dishonestly acquiring, using or disposing of physical or intellectual property belonging to a third party. This includes property belong to our visitors and users.
- 3.5 You must not:
 - (a) give or offer any payment, gift, hospitality or other benefit in the expectation that an additional advantage will be received in return, or to reward any participation in the Charity;
 - (b) accept any offer from a third party that you know or suspect is made with the expectation that we will provide an additional advantage for them or anyone else; or
 - (c) give or offer any payment (sometimes called a facilitation payment) to any local counsellor or Borough council employee (or any wider governmental employee) to gain any advantage or speed up a routine or necessary procedure.

4. Gifts and hospitality

- 4.1 This policy does not prohibit the giving or accepting of reasonable and appropriate hospitality for legitimate purposes such as building relationships, maintaining our image or reputation, or marketing our activities or offering.
- 4.2 A gift or hospitality will not be appropriate if it is unduly valuable, extravagant or could be seen as an inducement or reward for any preferential treatment (for example during any fundraising bid process).
- 4.3 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 cash equivalent (such as vouchers) or be given in secret. Gifts must be given in the Charity's name, not in your name.
- 4.4 Promotional gifts of low value such as the Charity's branded merchandise may be given with the permission of the General Manager or the Chair of Trustees.

5. Record-keeping to avoid theft and fraud

- 5.1 You must have permission from the General Manager or Chair before accepting hospitality or gifts, except for goodwill tips given to volunteers (from passengers on canal boat trips or participants in outdoor education sessions). Tips should be handed to the General Manager and will be shared equally between boating staff and volunteers at the end of the main boating season.
- 5.2 If you obtain the General Manager's or Chair's permission to offer hospitality, you must also submit all expenses claims relating to hospitality, gifts or payments to third parties in accordance with our expenses policy and record the reason for expenditure.
- 5.3 All accounts, invoices, and other records relating to dealings with third parties including suppliers and users should be prepared in the usual way and shared with the Charity's book-keeper. Nothing must be kept "off-book".
- 5.4 If you suspect an instance of theft or fraud you should immediately raise this with the General Manager or the Chair of Trustees.

6. Handling of incidents

- 6.1 Any reports of theft, fraud, bribery or corruption will be investigated promptly and thoroughly. If necessary, we will not hesitate to report the matter to the Police, Action Fraud, the Charity Commission, or any other appropriate body without notice to alleged perpetrator.
- 6.2 If you are offered a bribe, or are asked to make one, or if you suspect that any bribery, corruption, fraud, theft or other breach of this policy has occurred or may occur, you should raise this with the General Manager, the Chair of Trustees or in accordance with the Charity's whistle blowing policy.