

## **Anti-Bribery Policy**

### **1. Introduction**

The Health and Care Professions Council is committed to acting with objectivity and integrity and conducting all of its activities in an honest and ethical manner.

This includes preventing bribery and fostering a culture in which bribery will not be tolerated in any form.

Council members, committee members, employees, partners and all others who act on the HCPC's behalf must uphold the highest standards of integrity when doing so.

### **2. Bribery**

In essence, bribery is the giving or receiving of a financial or other inducement or advantage in connection with some improper performance of functions.

The Bribery Act 2010 creates two bribery offences:

- offering, promising or giving a financial or other advantage (the offence of bribing another person); and
- requesting, agreeing to receive or accepting a financial or other advantage (the offence of being bribed).

In either case the bribe must be intended to induce improper conduct by the recipient, that is the improper exercise of a function of a public nature, or an activity connected with a business, trade or profession.

The Act also creates a separate offence of bribing a foreign public official. That offence is committed if a bribe is offered, promised or given to such an official with the intention of influencing the recipient in the performance of his or her public functions and with the intention of obtaining or retaining business or a business advantage.

### **3. Policy**

All forms of bribery are strictly prohibited. A person who is subject to this policy (**you**) must not:

- offer or give a bribe to, or seek or accept a bribe from, any individual or organisation; or
- seek or accept, any payment (in cash or kind) or other inducement in respect of any service provided by or on behalf of the HCPC.

If you are unsure about whether a particular act contravenes this policy, you should seek advice from the [HCPC Secretariat].

#### **4. Hospitality, gifts etc.**

This policy does not prohibit the acceptance, for legitimate purposes, of gifts or hospitality which are reasonable and appropriate.

A gift or hospitality will not be reasonable and appropriate if it is lavish or extravagant or may be seen as an inducement or reward for any preferential treatment.

A gift will be reasonable and appropriate if it is of modest value or a token nature, such as flowers or pens, t-shirts, diaries and similar promotional items. Such gifts do not include expensive items, cash or its equivalent (such as vouchers) or any gift given in secret. No gift or other offering should be accepted if the value is reasonably believed to be over £10.

Hospitality will be reasonable and appropriate if it is of modest value and related to HCPC's activities, such as meals or refreshments provided at meetings or conferences. Such hospitality does not include offers of entertainment, such as attendance at sporting or other events unconnected to the HCPC's activities.

You must not:

- accept a gift or hospitality which is not reasonable and appropriate;
- accept a gift under any circumstances from a supplier or potential supplier when a contract is being awarded or business is being transacted; or
- accept a discount which is not generally available or any similar inducement in respect of products or services purchased for private purposes from an HCPC supplier.

If you are unsure about whether any gift or hospitality contravenes this policy, you should seek advice from Bribery and Fraud <[bribery&fraud@hcpc-uk.org](mailto:bribery&fraud@hcpc-uk.org)>.

#### **5. Record keeping**

You must declare any gifts or hospitality which you receive or give.

You must prepare all records relating to dealings with suppliers and other relevant third parties completely and accurately.

#### **6. Raising a concern**

If you are offered a bribe or are asked to make one, or if you suspect that any bribery or other breach of this policy has occurred or may occur, you must report it as soon as possible to the HCPC Secretariat via [bribery&fraud@hcpc-uk.org](mailto:bribery&fraud@hcpc-uk.org)