



# UK-AFI

UNITED KINGDOM  
ASSOCIATION OF  
FIRE INVESTIGATORS®

# Anti-Bribery

# &

# Anti-Corruption

# Policy

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Charity number: 1124789

[www.uk-afi.org](http://www.uk-afi.org)



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## Table of Contents

<b>1. Introduction</b> .....	3
<b>2. Policy statement</b> .....	3
<b>3. Who is covered by the policy?</b> .....	3
<b>4. Definition of bribery</b> .....	4
<b>5. What is and what is NOT acceptable</b> .....	5
5.1 Gifts and hospitality .....	5
5.2 Facilitation Payments and Kickbacks .....	6
5.3 Political Contributions .....	6
5.4 Charitable Contributions .....	6
<b>6. Representative Responsibilities</b> .....	7
<b>7. What happens if I need to raise a concern?</b> .....	7
7.1 How to raise a concern .....	7
7.2 What to do if you are a victim of bribery or corruption .....	7
7.3 Protection .....	8
<b>8. Communication</b> .....	8
<b>9. Record keeping</b> .....	8
<b>10. Monitoring and reviewing</b> .....	9



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## 1. Introduction

- 1.1 This anti-bribery and corruption policy exist to set out the responsibilities of the United Kingdom Association of Fire Investigators (UK-AFI) and those who work on its behalf in regards to observing and upholding the Associations' zero-tolerance position on bribery and corruption.
- 1.2 It also exists to act as a source of information and guidance for those working on behalf of UK-AFI. It helps them recognise and deal with bribery and corruption issues, as well as understand their responsibilities.

## 2. Policy statement

- 2.1 UK-AFI is committed to conducting business in an ethical and honest manner, and is committed to implementing and enforcing systems that ensure bribery is prevented. UK-AFI has zero-tolerance for bribery and corrupt activities. We are committed to acting professionally, fairly, and with integrity in all business dealings and relationships, in whatever jurisdiction we operate.
- 2.2 UK-AFI will constantly uphold all laws relating to anti-bribery and corruption in all the jurisdictions in which it operates. We are bound by the laws of the UK, including the Bribery Act 2010, in regards to our conduct both at home and abroad.
- 2.3 UK-AFI recognises that bribery and corruption are punishable by up to ten years of imprisonment and a fine. If the association is discovered to have taken part in corrupt activities, we may be subjected to an unlimited fine and face serious reputational damage. It is with this in mind that we commit to preventing bribery and corruption in our business activities, and take our legal responsibilities seriously.

## 3. Who is covered by the policy?

- 3.1 This anti-bribery policy applies to all employees (whether temporary, fixed-term, or permanent), consultants, contractors, executive board members, board members, volunteers, sponsors, or any other person or persons associated with us (including third parties), no matter where they are located (within or outside of the UK).



- 3.2** In the context of this policy, third-party refers to any individual or organisation UK-AFI meets and works with. It refers to actual and potential sponsors, members, suppliers, distributors, business contacts, advisers, and government and public bodies – this includes their advisors, representatives and officials, politicians, and public parties.
- 3.3** Any arrangements UK-AFI makes with a third party, for example speaker agreements and conference facilitators are 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**

- 4.1** Bribery refers to the act of offering, giving, promising, asking, agreeing, receiving, accepting, or soliciting something of value or of an advantage so to induce or influence an action or decision.
- 4.2** A bribe refers to any inducement, reward, or object/item of value offered to another individual in order to gain commercial, contractual, regulatory, or personal advantage.
- 4.3** 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.
- 4.4** Bribery is illegal. Any person connected to UK-AFI must not engage in any form of bribery, whether it be directly, passively (as described above), or through a third party (such as an agent or distributor). They must not accept bribes in any degree and if they are uncertain about whether something is a bribe or a gift or act of hospitality, they must seek further advice from the association's compliance manager.



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## 5. What is and what is NOT acceptable

### 5.1 Gifts and hospitality

5.1.1 UK-AFI accepts normal and appropriate gestures of hospitality and goodwill (whether given to/received from third parties) so long as the giving or receiving of gifts meets **ALL** of the following requirements:

- a. It is not made with the intention of influencing the party to whom it is being given, to obtain or reward the retention of a business or a business advantage, or as an explicit or implicit exchange for favours or benefits.
- b. It is not made with the suggestion that a return favour is expected.
- c. It is in compliance with local law.
- d. It is given in the name of the association, not in an individual's name.
- e. It does not include cash or a cash equivalent (e.g. a voucher or gift certificate).
- f. It is appropriate for the circumstances (e.g. giving small gifts around Christmas or as a small thank you to a company for helping with a large project upon completion).
- g. It is of an appropriate type and value and given at an appropriate time, taking into account the reason for the gift.
- h. It is given/received openly, not secretly.
- i. It is not selectively given to a key, influential person, clearly with the intention of directly influencing them.
- j. It is not above a certain excessive value, as pre-determined by the association's compliance manager (usually in excess of £20).
- k. It is not offered to, or accepted from, a government official or representative or politician or political party, without the prior approval of the association's compliance manager.
- l. All gifts and hospitality must be declared to the associations compliance manager who will ensure it is suitably recorded for declaration at each AGM.

5.1.2 Where it is inappropriate to decline the offer of a gift (i.e. when meeting with an individual of a certain religion/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.

5.1.3 UK-AFI recognises that the practice of giving and receiving business gifts varies between countries, regions, cultures, and religions, so



definitions of what is acceptable and not acceptable will inevitably differ for each.

**5.1.4** The intention behind a gift being given/received should always be considered. If there is any suspicion or uncertainty, the advice of the UK-AFI compliance manager should be sought.

## **5.2 Facilitation Payments and Kickbacks**

**5.2.1** UK-AFI does not accept and will not make any form of facilitation payments of any nature. We recognise that facilitation payments are a form of bribery that involves expediting or facilitating the performance of a public official for a routine governmental action. We recognise that 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.

**5.2.2** UK-AFI does not allow kickbacks to be made or accepted. We recognise that kickbacks are typically made in exchange for a business favour or advantage.

## **5.3 Political Contributions**

**5.3.1** UK-AFI 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.

## **5.4 Charitable Contributions**

**5.4.1** UK-AFI accepts (and indeed encourages) the act of donating to charities, whether through services, knowledge, time, or direct financial contributions (cash or otherwise) – and will disclose all charitable contributions it makes.

**5.4.2** The association will exercise caution to ensure that charitable contributions are not used to facilitate and conceal acts of bribery.

**5.4.3** UK-AFI 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 prior approval of the compliance manager.



## 6. Representative Responsibilities

- 6.1 The association president, vice president, past presidents, executive directors, directors and members are equally responsible for the prevention, detection, and reporting of bribery and other forms of corruption. They are required to avoid any activities that could lead to, or imply, a breach of this anti-bribery policy.
- 6.2 If any person has reason to believe or suspect that an instance of bribery or corruption has occurred or will occur in the future that breaches this policy, they must notify the compliance manager.
- 6.3 If any person has reason to believe or suspect that an instance of bribery or corruption has occurred or will occur in the future that breaches this policy, which involves the association compliance manager, directly or indirectly, they must notify the current association president.
- 6.4 If any representative or member of the UK-AFI breaches this policy, they will face disciplinary action via an Ethical Practice and Grievance Committee and could face dismissal from the association for misconduct. UK-AFI reserves the right to terminate any contractual relationship with any person, company or agent if they are found to have breached this anti-bribery policy.

## 7. What happens if I need to raise a concern?

### 7.1 How to raise a concern

- 7.1.1 If you suspect that there is an instance of bribery or corrupt activities occurring in relation to the UK-AFI, you are encouraged to raise your concerns at as early a stage as possible. If you're uncertain about whether a certain action or behaviour can be considered bribery or corruption, you should speak to the association compliance manager, the association president or any member of the board of directors, in strict confidence.

### 7.2 What to do if you are a victim of bribery or corruption

- 7.2.1 You must inform the association compliance manager as soon as possible 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 in



the near future, or if you have reason to believe that you are a victim of another corrupt activity.

## **7.3 Protection**

**7.3.1** If you refuse to accept or offer a bribe or you report a concern relating to potential act(s) of bribery or corruption, the association understands that you may feel worried about potential repercussions. The association will support anyone who raises concerns in good faith under this policy, even if investigation finds that they were mistaken.

**7.3.2** UK-AFI 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.

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

**7.3.4** 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, you should inform the association compliance manager immediately.

## **8. Communication**

**8.1** UK-AFI's anti-bribery and corruption policy and zero-tolerance attitude will be clearly communicated to all members, suppliers, contractors, business partners, and any third-parties at the outset of business relations, and as appropriate thereafter.

## **9. Record keeping**

**9.1** UK-AFI will keep detailed and accurate financial records, and will have 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 acts of hospitality are subject to review by the association compliance manager, together with the board of directors and the association president.



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## 10. Monitoring and reviewing

- 10.1** The UK-AFI Vice President is the nominated association compliance manager.
- 10.2** UK-AFI's compliance manager is responsible for monitoring the effectiveness of this policy and will review the implementation of it on a regular basis. They will assess its suitability, adequacy, and effectiveness.
- 10.2** Internal control systems and procedures designed to prevent bribery and corruption are subject to regular audits to ensure that they are effective in practice.
- 10.3** Any need for improvements will be applied as soon as possible. All persons connected to the association are encouraged to offer their feedback on this policy if they have any suggestions for how it may be improved. Feedback of this nature should be addressed to the compliance manager.
- 10.4** This policy does not form part of any contract of employment and the association may amend it at any time so to improve its effectiveness at combatting bribery and corruption.

Vice President (Compliance manager) name: Chris Ward

Compliance manager signature:

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