



Glamorgan-Gwent Archaeological Trust Ltd

Anti-Bribery and Corruption Policy

Introduction

The Bribery Act 2010 came into force in England and Wales on 1 July 2011; it clarifies the duty of the organisation and its staff. The legislation prohibits the offering, the giving, the solicitation or the acceptance of any bribe, whether as cash or any other kind of inducement.

The Glamorgan-Gwent Archaeological Trust (hereafter GGAT) is committed to maintaining the highest possible ethical standards in all its activities. GGAT is opposed to any form of bribery and this policy clearly sets out this position.

The purpose of this policy is to set out the responsibilities of groups and individuals in upholding GGAT's position on bribery. The policy applies to all staff and all business activities anywhere in the world. Any breach of this policy will result in disciplinary action.

Policy Statement

GGAT prohibits the offering, the giving, the solicitation or the acceptance of any bribe, whether as cash or any other kind of inducement. A bribe is an inducement or reward offered, promised or provided in order to gain any commercial, contracted, regulatory, monetary, financial, or other personal advantage:

- to or from any person or company, whether a public official or public body, or a private person or company, wherever they are situated; or
- by any individual trustee, employee, agent or other person or body acting on GGAT's behalf;
- in order to gain any commercial, contractual or regulatory advantage for GGAT; or
- in order to gain any personal advantage, pecuniary or otherwise, for the individual or anyone connected with the individual.

For the avoidance of doubt, this policy prohibits the making, giving or receiving of any inducement which results in, or may be perceived as resulting in, a personal gain or advantage to the recipient or any person or body associated with the recipient, and which is intended to influence the recipient to take action which may not be solely in the best interests of GGAT.

This policy applies to GGAT and its subsidiary trusts or any companies that it might establish.

This policy is not intended to prohibit the following practices provided they are customary in a particular market, are proportionate and are properly recorded:

- normal and appropriate hospitality, as allowed by GGAT's expenses procedure and advice set out in GGAT's employee handbook;
- the giving of a ceremonial or commemorative gift; or
- payment for specific services duly authorised and recorded by GGAT in accord with its Financial procedures.

Responsibilities

The prevention, detection and reporting of bribery is the responsibility of trustees and all employees throughout GGAT. If and when an instance of bribery is identified, remedial steps must be taken immediately, including the reporting of the incident (or suspected incident) to the Chief Executive or any trustee.



The Chair of the Board of Trustees and the Chief Executive should ensure that all trustees and managers and team leaders are aware of this policy and of their responsibilities to act in accordance with its procedures.

Managers and team leaders should ensure all their employees are aware of this policy and of their responsibilities to act in accordance with its procedures.

If in doubt as to whether a potential act constitutes bribery, the matter should be referred to the Chief Executive Officer of Board of Trustees for guidance.

Raising concerns and seeking guidance

Any concerns should be raised using the protocols set out in our whistleblowing policy.

Adoption and Review

This policy was adopted 24 March 2017.

This policy will be periodically reviewed by the Board of Trustees.