



Tyne & Wear Archives & Museums

Anti-Bribery and Corruption Policy

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November 2016

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TWAM Anti-Bribery and Corruption Policy

Bribery is a criminal offence.

TWAM has a zero tolerance towards bribery.

- *We do not, and will not, pay bribes or offer improper inducements to anyone for any purpose, nor do we or will we, accept bribes or improper inducements.*
- *We will not use a third party as a conduit to channel bribes to others.*
- *We do not, and will not, engage indirectly in or otherwise encourage bribery*
- *We aim to maintain anti-bribery compliance as “business as usual”, rather than as a one-off exercise.*

Objective of this policy

This policy provides a framework to enable TWAM’s employees, volunteers and suppliers to comply with the law - The Bribery Act 2010

<http://www.legislation.gov.uk/ukpga/2010/23/contents>

Scope of this policy

This policy applies to all of TWAM activities.

- Within TWAM the responsibility to control the risk of bribery occurring resides at all levels.
- For partners and suppliers, we will seek to promote the adoption of policies consistent with the principles set out in this policy.

What is “Bribery”?

Bribery is a financial or other inducement or reward offered, promised or provided to gain personal, commercial, regulatory or contractual advantage.

Under the Bribery Act 2010, it is an offence for you to:-

1. Bribe another person
2. Be bribed
3. Bribe a foreign public official
4. There is also a ‘corporate offence’ of failing to prevent bribery. Under this, TWAM will be guilty of an offence if an “Associated Person” bribes someone else intending to obtain or retain business, or a business advantage, for TWAM “Associated Persons” may include employees, agents and subsidiaries.

TWAM commitments

It is unacceptable to:

- Give, promise to give, or offer a payment, gift or hospitality with the expectation or hope that an advantage will be received.
- Accept any offer or payment from a third party that you know or suspect is made with the expectation that it will obtain an advantage for them, or will be provided by us in return.
- Retaliate against or threaten a person who has refused to commit a bribery offence or who has raised concerns under this policy.
- Engage in activity in breach of this policy.
- Give or accept facilitation payments which are illegal. Facilitation payments are unofficial payments made to public officials in order to secure or expedite actions.

Gifts and hospitality - This policy is not meant to change the requirements of our existing gifts and hospitality policy.

Staff responsibilities

TWAM is committed to ensuring that all employees, volunteers or suppliers have a safe, reliable, and confidential way of reporting any suspicious activity. We want each and every person to know how they can raise concerns.

We all have a responsibility to help detect, prevent and report instances of bribery.

Staff and volunteers must:

- Ensure that they read, understand and comply with this policy.
- Raise concerns as soon as possible if they believe or suspect that a conflict with this policy has occurred, or may occur in the future.
- Refer to the confidential reporting policy to determine their course of action <https://twmuseums.org.uk/corporate-publications-and-policies/policies>