

Anti-Bribery and Corruption Policy

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US Anti-Bribery and Corruption Policy

Introduction

The United Synagogue (the Charity) is committed to acting with integrity, honesty, and transparency. It takes a zero-tolerance approach to bribery and corruption and expects everyone acting on its behalf to meet high standards of ethical conduct.

Purpose

This policy explains the Charity's approach to preventing bribery and corruption, supports compliance with the [Bribery Act 2010](#), and gives employees, trustees, volunteers, agency workers, contractors, consultants and other third parties acting for or on behalf of the Charity, clear guidance on how to identify, prevent and report bribery risks.

Scope

This policy applies to all employees, trustees, volunteers, agency workers, contractors, consultants and other third parties acting for or on behalf of the Charity, wherever they are based.

Legal Framework

This policy is informed by the [Bribery Act 2010](#), the [Fraud Act 2006](#) and relevant Charity Commission guidance, including [CC3: The Essential Trustee](#) and [CC8: Internal Financial Controls for Charities](#). The Charity maintains proportionate procedures in line with Ministry of Justice guidance, including risk assessment, due diligence, training, monitoring and periodic review.

Associated Policies

This policy should be read alongside the following related policies:

- [Code of Conduct](#)
- [Whistleblowing Policy](#)
- [Conflicts of Interest Policy](#)
- [Expenses Policy](#)
- [Procurement Policy](#)
- [Fraud Policy and Fraud Response Plan](#)
- [Disciplinary Policy and Procedure](#)

Statement of Principle

The Charity is committed to integrity, honesty, and ethical conduct in all its activities. It takes a zero-tolerance approach to bribery and corruption and does not allow anyone acting for or on behalf of the Charity to offer, promise, give, request, agree to receive or accept a bribe, facilitation payment, or any other improper advantage.

Roles and Responsibilities

Trustees

Trustees must:

- Promote integrity, transparency, and ethical conduct.
- Approve and review this policy and related procedures.
- Ensure effective controls, registers and reporting are in place.
- Oversee bribery and corruption risks.
- Review significant concerns, breaches, and trends.
- Ensure matters are escalated and reported where required.

Senior Leadership Team

The Senior Leadership Team must:

- Implement this policy across the Charity.
- Embed anti-bribery controls in finance, procurement, and operations.
- Maintain approval controls for gifts, hospitality, and spending.
- Ensure training, guidance, and awareness.
- Include bribery risks in the Charity's risk framework.
- Ensure concerns are escalated, investigated, and addressed promptly.

Compliance Officer / Director of Legal Services

The Compliance Officer / Director of Legal Services must:

- Provide advice on this policy and related policies.
- Monitor compliance, declarations, and registers.
- Manage concerns under the Whistleblowing Policy
- Support the identification and assessment of bribery and corruption risks.
- Escalate matters where appropriate.
- Oversee the anti-bribery framework.

Managers

Managers must:

- Ensure compliance in their areas.
- Ensure staff and volunteers understand this policy.
- Review, approve and record declarations.
- Prevent anyone from approving their own gifts, hospitality, or expenses.
- Manage conflicts of interest and withdrawals.
- Escalate concerns or suspected breaches promptly.

Employees, Trustees, Volunteers and Third Parties

All individuals acting for or on behalf of the Charity must:

- Comply with this policy.
- Act with integrity, honesty, and transparency.
- Not offer, give, request, or accept bribes or improper advantages.
- Follow the rules on gifts and hospitality.

- Declare conflicts of interest promptly.
- Withdraw from decisions where there is a conflict or risk of improper influence.
- Report concerns promptly.

Third Parties (Contractors, Suppliers, Consultants and Agents)

The Charity will:

- Communicate its zero-tolerance approach.
- Carry out proportionate due diligence.
- Require anti-bribery obligations in contracts.
- Act where there is non-compliance, including termination where appropriate.

Gifts and Hospitality

Gifts and hospitality must not be offered, given, requested or accepted if they could influence, or appear to influence, a decision or secure an improper advantage. They may be offered or accepted only if they are reasonable, proportionate and consistent with this policy. Any gift or hospitality over £100 must be approved in advance and recorded on the Gift Declaration Form in Appendix 1, with the reason for approval. The £100 threshold is a guide only and does not mean anything below this amount is automatically acceptable.

Gifts to Rabbis and Rebbetzens

The Charity recognises that Rabbis and Rebbetzens may receive gifts from members as a sign of thanks or appreciation. These may be accepted only if the total from any one member does not exceed £100 in a calendar year, the gift is not cash or a cash equivalent, and accepting it would not create an actual, potential or perceived conflict of interest or affect professional judgement.

The Charity also recognises that a member may occasionally offer a Rabbi and Rebbetzen temporary use of a holiday home as a gesture of support or appreciation. Any such offer must be declared in advance and may be accepted only if it is appropriate, proportionate, non-financial and does not create an actual, potential or perceived conflict of interest.

Reporting Concerns

Suspected bribery, corruption or other wrongdoing must be reported promptly to the Compliance Officer or Director of Legal Services under the Charity's Whistleblowing Policy. No one who raises a genuine concern in good faith will suffer any detriment.

Breaches

Breaches of this policy will be treated seriously and may be addressed under the Charity's Disciplinary Policy and Procedure, where applicable. For employees, this may lead to disciplinary action up to and including dismissal. For trustees, volunteers, contractors, consultants and other third parties, it may lead to termination of the appointment, role, engagement or contract, and may also result in legal action.

Review

This policy will be reviewed every two years to ensure that it remains appropriate, up to date, and compliant with current law and best practice.

Appendix 1: Gift Declaration Form

Complete this form if any gift or hospitality is offered, received, accepted, or declined, in line with this policy and the Charity's Gifts and Hospitality Guidance.

Gift Declaration Form

Individual Details

Name _____

Role / Job Title _____

Department/Team _____

Gift Details

Date gift offered/received. _____

Status

☐ Offered and declined

☐ Offered and accepted

Description of the gift

Estimated value (£) _____

Nature of the gift

☐ Cash or cash equivalent

☐ Physical item

☐ Voucher

☐ Hospitality (for example, a meal or event)

☐ Other (please specify): _____

Source of Gift

Name of individual or organisation giving the gift

☐ Supplier

☐ Contractor

☐ Service user or member

Relationship to the Charity

☐ Donor

☐ Other (please specify): _____

Context and Purpose

Reason for the gift being offered

Was the gift linked to any decision, contract, or service? ☐ Yes
☐ No

If yes, please provide details

Declaration

I confirm that:

- ☐ this gift or hospitality has been declared in accordance with the Gifts and Hospitality Guidance;
- ☐ I have not solicited this gift or hospitality; and
- ☐ to the best of my knowledge, accepting this gift or hospitality does not give rise to a conflict of interest.

Signature

Date

Authorisation

Decision

- ☐ Approved
- ☐ Approved subject to conditions
- ☐ Not approved

Comments / conditions (including action taken, where relevant)

Authorising manager

Signature

Date

Retention of completed forms

Completed forms must be kept securely in line with the Charity's data retention requirements and any legal or regulatory requirements.

They must be stored securely in a restricted-access file, whether electronic or paper, and be available for audit, oversight, and review.