

## **Anti-Fraud, Bribery, Corruption & Malpractice Policy (Incorporating 'Whistle-blowing')**

### **Introduction**

The Parish of Llandudno is committed at all times to operating with the highest standards of integrity, honesty, openness and accountability.

The Parish of Llandudno operates a zero tolerance policy towards the giving and receiving of bribes because it is morally wrong and illegal in the UK.

The Parish of Llandudno expectation on propriety and accountability is that the Vicar, Curates, and all ministers, ordained or lay, trustees and elected officers will lead by example in ensuring adherence to rules, and that all procedures and practices are above reproach

The PCC also expects and requires individuals and organisations that it comes into contact with, to act with integrity and without thought or actions involving fraud, bribery, corruption or malpractice.

This Anti-Fraud, Bribery, Corruption & Malpractice Policy is designed to:-

- Encourage prevention;
- Promote detection and
- Explain Actions to be taken when offered a bribe.

### **Bribery**

Bribery is the offering, promising, giving, accepting or soliciting of money, a gift or other advantage as an inducement to do something that is illegal or a breach of trust in the course of carrying out activities related to the Parish of Llandudno.

Under the Bribery Act 2010 it is illegal to give or receive a bribe and the Parochial Church Councillors would be liable for bribes taken or given on their behalf where it does not have procedures in place.

### **Responsibilities**

The Parish of Llandudno expects the Vicar, Curates, and all ministers, ordained or lay, trustees and elected officers to adhere to the Anti-Fraud, Bribery, Corruption & Malpractice Policy of the Church in Wales, and of any code of conduct relating to their position and responsibilities which include :-

- Ensuring when recruiting new members that they establish, as far as possible, through written references the known honesty and integrity of potential members before an appointment is made.

- Providing members with appropriate information, guidance and training in their responsibilities and duties to ensure that best practice is regularly highlighted and reinforced.
- Providing a register and recording any offers of gifts and or hospitality which in any way relates to the performance of their duties which will be held by the PCC Secretary.
- Encouraging its members to raise serious concerns that they may have about any aspect of the work or the conduct of its members or trustees.
- Dealing with a member who attempts to defraud the PCC or who is corrupt or is guilty of serious malpractice by referral to the appropriate authorities.

### **Action when offered a Bribe**

Individuals should reject all demands for offers of bribes, and the Parish of Handudno stance on bribes should be made clear.

All offers of bribes should be recorded and reported to the Vicar as soon as possible after the event. Any instances of actual or potential bribes should be investigated immediately by the Vicar and Parish Wardens.

Hospitality or promotional expenditure which is proportionate and reasonable to demonstrating goods or services or reflecting your good relations is unlikely to qualify as a bribe. The Vicar, Curates, and all ministers, ordained or lay, trustees and elected officers of the Parish of Handudno, are expected to register any offers of gifts and or hospitality which in any way relates to the performance of their duties in a register that will be held by the Parish Secretary.

All members of the Parish of Handudno are expected to express any concerns they may have regarding fraud or malpractice by any member of the Parish. These will be without prejudice under the Public Disclosure Act 1998. Although everything possible will be done to keep their identity a secret, there may be circumstances, such as the report becomes the subject of a criminal investigation, where you may be called as a witness. Should this be the case then the matter will be discussed with the individual as the earliest opportunity.

Parishioners should express their concerns to either the Vicar or Churchwardens. Should the concern relate to any of these officers, then they should be reported to either the Parish Secretary or the Archdeacon of Banger.

Concerns expressed anonymously make investigations difficult to undertake. However, they will be considered for investigation at the discretion of the Vicar and the Archdeacon of Banger.

The Parish of Llandudno will deal with an individual who attempts to defraud the Parish or who is corrupt or is guilty of serious malpractice of whatever description through the disciplinary process of the Church in Wales.

The Parish of Llandudno will normally wish the Police to independently prosecute offenders where financial impropriety is discovered.

This policy will be reviewed annually, or after any significant change in the organisation, or after any significant incident.

J E Nice  
Chairman of PCC  
& Rector

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