

**Lung Cancer Nursing UK (Hereafter LCNUK)
Policy on Bribery**

Background

The Bribery Act came into force in 2010 and LCNUK is responsible for ensuring it has appropriate policies and procedures in place, including training of employees and others undertaking work on its behalf.

The board of trustees have a legal responsibility to manage resources responsibly which includes protecting the charity from the risks posed by bribery and corruption.

The key area identified as relevant to LCNUK is the provision and receipt of gifts, hospitality, and entertainment.

Bribery Policy

The LCNUK is committed to preventing bribery by persons associated with it, including its trustees, and committee members. The organisation has a zero-tolerance approach to bribery. If trustees and committee members are found to have offered or accepted bribes they may, following the appropriate procedures, be dismissed from their role with the organisation (as well as potentially facing criminal prosecution). As far as practically possible, the organisation will not do business with organisations that are found to offer or accept bribes.

For these purposes, bribery occurs where a person offers, promises, or gives a financial or other advantage to another person:

- intending the advantage to bring about the improper performance by that person of a relevant function or activity or to reward such improper performance; or
- knowing or believing that the acceptance of the advantage offered, promised, or given constitutes the improper performance of a relevant function or activity.

‘Improper performance’ means performance which amounts to a breach of an expectation that a person will act in good faith, impartially, or in accordance with a position of trust.

Hospitality, gifts and entertainment

The issues of hospitality, gifts and entertainment are addressed in detail in the ABPI Code of Practice for the Pharmaceutical Industry to which LCNUK complies in order to meet the requirements of its funders. Such issues are also addressed in the conflicts of interest policy with regards to interests individuals have in other organisations which may impact on their actions within LCNUK. The provision of ordinary hospitality should not amount to bribery. Nevertheless, the organisation requires trustees, and committee members to exercise considerable caution in all matters relating to offers and receipt of hospitality to and from third parties in relation to LCNUK activities. Trustees and committee members must act and be seen to act in a way which is fair, impartial, and unbiased and must be aware of the risks and perceptions which may arise in such circumstances and act accordingly. In addition:

- Offers of gifts or hospitality in relation to a LCNUK activity to trustees and committee members likely to exceed £50 in value should be discussed with the Chairman of the Trustees before acceptance;
- Any hospitality to third parties to be charged to LCNUK must be connected with bona fide meetings and in circumstances where it would be discourteous to fail to offer hospitality. Such hospitality will only take the form of the provision of appropriate refreshments and must be capable of justification. Full details of all those to whom hospitality is provided must be provided with the claim for reimbursement.

Taking action when things go wrong

Irrelevant of the circumstance or nature of the payment, if your charity has experienced bribery and corruption, you should report it to the [National Crime Agency](#). You should also report serious incidents to the charity commission by emailing rsi@charitycommission.gov.uk

Date last approved by Trustees: 4th April 2022

Date of next review: April 2025