



**Bedford Morison and Cordery Almshouse
Charity**

Dame Mary Morison Apprenticeship Trust

**BEDFORD, MORISON & CORDERY ALMSHOUSE CHARITY
DAME MARY MORISON APPRENTICESHIP TRUST**

**FINANCIAL PRUDENCE
Anti-Bribery and Corruption Policy**

Bedford Morison and Cordery Almshouse Charity, Watford, was established in 1580
England and Wales Charity Registration number: 207042

Dame Mary Morison Apprenticeship Trust

*Established 6 April 1629 to aid and assist young persons (poor children of the Town and
Parish of Watford) during their educational years*

England and Wales Charity Registration number: 312129

Registered Office: 19 St Mary's Close, Watford, WD18 0EQ

INTRODUCTION

- 1.1 The Bribery Act 2010, which came into force on *1 July 2011*, made it an offence for a UK national or person located in the UK to pay or receive a bribe, either directly or indirectly. Companies and partnerships can also commit an offence for failing to prevent bribery, where a bribe has been paid on their behalf by an "associated person".
- 1.2 The Bedford, Morison and Cordery Almshouse Charity (and the Dame Mary Morison Apprenticeship Trust) are committed to conducting its business with the highest standards of honesty and integrity. Bribery and corruption are unacceptable in any form and will not be tolerated. This policy sets out the Charity's stance on preventing bribery and corruption and outlines the responsibilities of all stakeholders in ensuring that we comply with anti-bribery laws and regulations.

PURPOSE

- 2.1 The purpose of this Financial Prudence (Anti-Bribery and Corruption) Policy is to:
 - Ensure compliance with all relevant anti-bribery laws, including Fraud Act 2006, Bribery Act 2010, Criminal Finances Act 2017, Regulatory requirements and applicable guidance including Managing Public Money. Trustees are required under charity law to safeguard the assets of the charity.
 - Provide guidance on what constitutes bribery and corruption.
 - Set out the measures that The Bedford, Morison and Cordery Almshouse Charity will take to prevent and address bribery and corruption.

DEFINITION

- 3.1 Bribery is the offering, giving, receiving, or soliciting of anything of value to influence the actions of an individual in a position of responsibility. Corruption refers to the abuse of power for personal gain, typically involving bribery, fraud, or the illegal use of authority.
Examples of bribery include:
 - Offering or receiving a bribe in exchange for preferential treatment.
 - Offering gifts, entertainment, or payments with the intention of influencing a decision.
 - Falsifying documents to conceal illicit payments or benefits.

PROHIBITED ACTIVITIES

- 4.1 The Bedford, Morison and Cordery Almshouse Charity strictly prohibits:
 - Offering, giving, or accepting bribes or other improper financial inducements.
 - Engaging in corrupt practices, including but not limited to fraud, kickbacks, or misappropriation of assets.
 - Offering or accepting gifts or hospitality that could be construed as an attempt to influence business decisions or gain an unfair advantage.
- 4.2 **Gifts and Hospitality**
Gifts and hospitality must be:
 - Given or received only in accordance with legal and ethical business practices.
 - Reasonable and appropriate in value.
 - Transparent, fully disclosed, and approved by management where necessary.
 - Not intended to improperly influence business decisions or relationships.

- 4.3 Any offer of gifts, entertainment, or benefits that may raise concerns about potential bribery or corruption must be reported to the Chair, Vice Chair and/or Treasurer as appropriate.

THIRD PARTIES

- 5.1 The Bedford, Morison and Cordery Almshouse Charity expects its suppliers, contractors, agents, and any third parties acting on its behalf to adhere to the same high standards regarding anti-bribery and anti-corruption. We will conduct appropriate due diligence to assess the integrity and compliance of third parties and may terminate relationships with those found to be engaging in corrupt practices. This applies to both the engagement of contactors and admission of potential residents.

OPERATION OF THE POLICY

- 6.1 Concerns about potential breaches of this policy should be reported through the designated channels to the Chair, Vice Chair and/or Treasurer as appropriate. All reports will be investigated thoroughly and addressed in a timely manner. The Bedford, Morison and Cordery Almshouse Charity is committed to ensuring that individuals who report concerns are protected from retaliation.

6.2 **Consequences of Policy Violations**

Any individual or third party found to have violated this policy will face appropriate action, which may include termination of contracts or business relationships. In cases of illegal conduct, The Bedford, Morison and Cordery Almshouse Charity will report violations to the appropriate authorities, which could result in criminal charges or other legal consequences.

6.3 **Training and Awareness**

All relevant parties, including suppliers and business partners, will be informed of this policy and may be required to undergo training on anti-bribery and anti-corruption practices as necessary.

6.4 **Review of Policy**

This policy will be reviewed regularly to ensure its continued relevance and compliance with applicable laws and regulations. Updates or amendments will be communicated as necessary.

CONCLUSION

- 7.1 The Bedford, Morison and Cordery Almshouse Charity is committed to ensuring that all its operations are conducted ethically and in compliance with anti-bribery and anti-corruption laws. We rely on the integrity and transparency of all stakeholders to maintain our high standards and protect the charity's reputation.

This policy has been approved for issue by the board of trustees:

Name: Felicity Evans MBE, Chair of Trustees

Date: 10 June 2025