

Anti-Bribery and Corruption Policy

1. Policy Statement

World Aid Network (WAN) has a zero-tolerance approach to bribery and corruption. We are committed to acting professionally, fairly and with integrity in all dealings, and to complying with the Bribery Act 2010 and equivalent legislation in every territory where WAN operates.

2. Scope

This policy applies to all trustees, employees, volunteers, contractors, partners and any other person performing services for or on behalf of WAN, in the United Kingdom and overseas.

3. Definitions

Bribery is offering, promising, giving, requesting or accepting any financial or other advantage in order to induce or reward improper performance, or in connection with the improper performance of a relevant function. The four offences under the Bribery Act 2010 are (1) bribing another person, (2) being bribed, (3) bribing a foreign public official, and (4) failure of a commercial organisation to prevent bribery.

4. Facilitation Payments

Facilitation payments — small, unofficial payments made to secure or expedite a routine government action — are prohibited under this policy and under the Bribery Act 2010, regardless of local custom. The only exception is a payment demanded under genuine duress where there is an immediate threat to personal safety, which must be reported to the Chair of Trustees within 24 hours and recorded.

5. Gifts and Hospitality

No person associated with WAN may offer or accept any gift or hospitality that could be perceived as a bribe or as an attempt to influence a decision. Any gift or hospitality with a value over £50 must be declared and recorded in the Register of Gifts and Hospitality.

6. Risk Assessment and Due Diligence

The board conducts an annual bribery and corruption risk assessment of all overseas operations, partnerships and procurement, with proportionate controls reflected in the Risk Register and partner due-diligence files under the Grant-making Policy.

7. Reporting Concerns

Any suspicion or evidence of bribery or corruption must be reported immediately to the Chair of Trustees, or via the Whistleblowing Policy. Reports may also be made to the National Crime Agency or the police. No person will suffer detriment for raising a concern in good faith.

8. Serious Incident Reporting

A confirmed or credibly suspected incident of bribery or corruption is a Serious Incident reportable to the Charity Commission in line with the Commission's guidance "How to report a serious incident in your charity".

9. Review

This policy is reviewed annually by the trustees.