Anti-Bribery and Corruption Policy

1. **Policy Statement**
   Red Trouser Day is committed to conducting all its activities with honesty, transparency, and integrity. We operate a strict zero-tolerance approach to bribery and corruption. As a charitable organisation that relies on public trust and donations, we take seriously our responsibility to act ethically and lawfully at all times.

2. **Purpose**
   This policy ensures that Red Trouser Day complies with the UK Bribery Act 2010 and related legislation. It applies to all our activities and relationships, helping us identify and prevent bribery and other corrupt practices wherever they may arise.

3. **Scope**
   This policy applies to everyone associated with Red Trouser Day, including:
   - Trustees
   - Volunteers
   - Contractors or consultants
   - Donors
   - Partners and suppliers
   - Anyone representing or working on behalf of the charity

   We expect everyone involved to read, understand, and uphold this policy at all times.

4. **What Is Bribery?**
   Bribery involves offering, promising, giving, receiving, or soliciting something of value to improperly influence a decision or gain an unfair advantage. This includes:
   - Offering a bribe to secure donations or partnerships
   - Accepting gifts in exchange for influence
   - Making payments to officials or others to speed up routine processes ("facilitation payments")

   Red Trouser Day is also responsible if someone associated with us offers or accepts a bribe on our behalf.

5. **Gifts and Hospitality**
   We recognise that modest hospitality and the giving or receiving of low-value gifts may be part of charitable relationships. However, gifts or hospitality must never:
   - Be intended to influence decisions or secure unfair advantage
   - Include cash or equivalents (e.g., vouchers)
   - Be given or received during sensitive processes (e.g., grant applications)
   - Be excessive, secretive, or inappropriate in timing or value

   All gifts and hospitality must be transparent, proportionate, and declared to the Trustees if there is any doubt.

6. **Facilitation Payments and Kickbacks**

Red Trouser Day does not permit the use of facilitation payments or kickbacks. These are typically small, unofficial payments made to speed up a routine action, often in international or governmental contexts. If you feel coerced into making such a payment to protect your personal safety, report the matter as soon as possible to the Chair or another Trustee.

7. Unacceptable Conduct

The following behaviour is never acceptable:

- Offering or accepting bribes of any kind
- Making unofficial payments to secure advantage
- Giving or receiving gifts with an expectation of something in return
- Threatening someone who refuses to engage in bribery
- Ignoring or failing to report suspicious activity

8. Record-Keeping

We maintain clear and accurate records of all our financial dealings. Any expenses or donations involving third parties must be properly documented. No unrecorded or 'off-the-books' accounts will be permitted.

9. Raising Concerns and Reporting

If you suspect or become aware of bribery or corruption connected to Red Trouser Day, report it immediately to the Chair of Trustees or any other Trustee. We treat all disclosures seriously and in confidence.

10. Protection for Whistleblowers

Anyone who reports bribery concerns in good faith will be protected from retaliation or disadvantage, even if the concern turns out to be unfounded.

11. Trustee Responsibilities

The Board of Trustees holds overall responsibility for ensuring this policy is followed and that everyone associated with Red Trouser Day understands their obligations. Trustees will ensure appropriate oversight and review of this policy.

12. Review and Monitoring

This policy will be reviewed annually by the Board of Trustees to ensure it remains current, effective, and proportionate for our charitable activities.

13. "Red Flags" – Signs of Potential Bribery

The following are warning signs to look out for:

- A donor or supplier requests or offers unusual gifts or cash payments
- Requests for payments to offshore or unrelated accounts
- Refusal to confirm terms of agreements in writing
- Excessive or unexplained hospitality
- A person or organisation insists on working through unverified intermediaries

If you encounter any of these red flags, notify a Trustee immediately.

RTD Policy Framework

Policy Area	Lead Policy	Linked Policies
Risk	Risk Management	SIR, AML, ***Anti Bribery***, Safeguarding
People	Safeguarding	SIR, Complaints
Finance	Anti Money Laundering	Tainted Donations, Anti Bribery
Conduct	Conflict of Interest	Complaints, SIR , Data Protection, Privacy
Information	Privacy	Acceptable IT Use, Complaints, Social Media, Data Protection

SIR – Serious incident Reporting AML – Anti Money Laundering