



PCRS Policy on Bribery

Background

The Bribery Act came into force on 1 July 2012 and the charity is responsible for ensuring it has appropriate policies and procedures in place, including training of employees and others undertaking work on its behalf.

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

Bribery Policy

The PCRS is committed to preventing bribery by persons associated with it, including its trustees, Committee members, employees and key contractors. The Society has a zero tolerance approach to bribery. If trustees, Committee members, employees and key contractors are found to have offered or accepted bribes they may, following the appropriate procedures, be dismissed from their role with the Society (as well as potentially facing criminal prosecution). As far as practically possible, the Society 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 in itself 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 PCRS complies in order to meet the requirements of its funders. Such issues are also addressed in the PCRS conflicts of interest policy with regards to interests individuals have in other organisations which may impact on their actions within PCRS. The provision of ordinary hospitality should not amount to bribery. Nevertheless, the Society requires trustees, Committee members, employees and key contractors to exercise considerable caution in all matters relating to offers and receipt of hospitality to and from third parties in relation to PCRS activities. Trustees, Committee members, employees and key contractors must act and be seen to act in a way which is fair, impartial and unbiased. Trustees, Committee members, employees and key contractors 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 PCRS activity to trustees, Committee members, employees and key contractors likely to exceed £50 in value should be discussed with the CEO/Chairman of the Trustees before acceptance;
- Any hospitality to third parties to be charged to PCRS must be connected with bona fide PCRS 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.

Date of last review by PCRS Executive: November 2022
Date last approved by PCRS Trustees: November 2022
Date of next review: November 2025