

Gifts, Hospitality & Anti-Bribery Policy

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No Bought Influence. No Secret Benefits. Real Accountability.

Right First Time UK Ltd (RFTUK) will not buy or sell influence. This policy explains the standards for gifts, hospitality, donations, sponsorship, supplier relationships and reporting suspected bribery. It applies to decisions affecting RFTUK's public-interest work and Parent Contribution Service (PCS).

1. Purpose, scope and organisation

This policy applies to Directors, the Founder, Campaign Leaders, Campaigners, Volunteers, employees, contractors, agents, consultants and anyone acting for or on behalf of RFTUK. It also guides dealings with suppliers, donors, sponsors, partners, public officials, politicians and journalists.

Right First Time UK Ltd is a non-profit company limited by guarantee (company number 17493370). Its public-benefit purpose does not provide an exemption from applicable anti-bribery law. People outside RFTUK must not be allowed to obtain improper influence over its decisions.

2. Absolute prohibition on bribery

No one acting for RFTUK may offer, promise, give, request, agree to receive or accept money, gifts, services, opportunities or other advantages intended to induce or reward improper performance. The ban applies whether the advantage benefits RFTUK itself or another person or organisation.

Do not use a donor, intermediary, relative, contractor or partner to do indirectly what RFTUK would not lawfully do itself. Kickbacks, secret commissions, false invoices and disguised personal rewards are prohibited.

3. Law and proportionate prevention

The Bribery Act 2010 addresses offering or receiving bribes, bribing foreign public officials and, for qualifying commercial organisations, failure to prevent bribery by associated persons. Whether the corporate offence applies depends on the statutory conditions; RFTUK must not assume non-profit status removes all risk.

Anti-bribery arrangements should reflect the Ministry of Justice six principles: proportionate procedures, leadership commitment, risk assessment, due diligence, communication/training and monitoring/review. Controls must be followed in practice, not just published.

4. Leadership, responsibilities and risk assessment

Directors are responsible for appropriate oversight. Seniority does not create an exemption: the Founder, Directors and Campaign Leaders must not press others to bypass controls for commercial, political, reputational or campaigning reasons.

RFTUK should review risk before material procurement, large donations, sponsorship, lobbying, use of agents or intermediaries, overseas transactions, public-official contact, urgent unusual payments and transactions with connected persons. Higher risk calls for enhanced scrutiny and recorded decisions.

5. Gifts and ordinary hospitality

A gift can be an item, benefit, service or advantage received without its usual price. Modest bona fide gifts and reasonable refreshments or working meals can be acceptable when there is a proper purpose and no expectation of improper action.

Assess value, timing, frequency, purpose, who benefits, competing interests and public perception. Frequent or extravagant hospitality, secrecy or a benefit offered just before a decision is a warning sign. Calling something hospitality never makes an inducement lawful.

6. Cash, gift cards and personal advantages

Personal cash, gift cards, prepaid cards, cryptocurrency, undisclosed rebates, personal discounts and similar cash-equivalent benefits linked to an RFTUK decision should normally be refused and reported. A small amount is not automatically safe: intention and context determine the risk.

Genuine salary, authorised contractor payments, grants, refunds and evidenced expense reimbursements are different from secret personal rewards and must still follow the Financial Controls & Expenses Policy.

7. Gifts & Hospitality Register and approval

RFTUK should keep a proportionate Gifts & Hospitality Register for material, unusual, repeated or sensitive offers, including those declined. Record the date, parties, description, estimated value, reason, decision, approval, conflicts and action taken.

Sensitive benefits should be declared and, where practicable, approved before acceptance by an authorised unconflicted person. No one should independently approve their own higher-risk benefit. No financial threshold makes bribery lawful, and ordinary refreshments do not need excessive bureaucracy.

8. Public officials and political engagement

RFTUK may lobby Parliament, Government, councils and public authorities lawfully using evidence and democratic argument. It must not offer money, favours, gifts, hospitality, jobs or benefits for official decisions, preferential treatment or privileged access.

Ministers, MPs, councillors, civil servants, regulators, police and other public officials may be subject to stricter internal rules, which must be checked. RFTUK does not finance party or candidate endorsements and must assess electoral rules where activity could be regulated non-party campaigning.

9. Foreign officials and facilitation payments

Dealings with foreign public officials require heightened review. RFTUK must not offer a benefit intended to influence official action to obtain or retain business or an advantage where the applicable offence is engaged. Any proposed travel, accommodation, gifts or fees should be reviewed before commitment.

RFTUK prohibits unofficial facilitation payments to accelerate routine government action. If immediate threats make refusal unsafe, personal safety comes first: leave danger, record what happened when safe and report promptly.

10. Suppliers, procurement and intermediaries

Supplier selection must be based on legitimate organisational needs, proportionate value, transparent terms and appropriate approval. Secret commissions, inflated invoices and payments routed to unrelated third parties should be challenged.

Relevant family, employment or business connections must be declared. A connected supplier is not automatically forbidden, but a material arrangement must be in RFTUK's interests and independently assessed. Carry out proportionate due diligence on high-risk suppliers, contractors, agents and partners.

11. Donations, grants and sponsorship

A donation, grant or sponsorship may support an agreed lawful purpose but cannot buy research findings, campaigning conclusions, complaint outcomes, supplier decisions, governance votes, favourable coverage or suppression of evidence.

Significant or unusual funding should receive checks of the source, conditions and conflicts. Sponsorship benefits such as branding or attendance must be clearly stated. Donations for regulated non-party campaigning, if relevant, require a separate check of Electoral Commission rules before acceptance.

12. Support for community groups and people in need

RFTUK may support appropriate charities, community groups and public-benefit work where permitted by its Articles and properly authorised. Such support must not disguise a personal inducement to a public official, supplier or connected decision-maker.

Money, food, accommodation or other assistance must not be offered to pressure a vulnerable person to give testimony, appear in media, retract a complaint or support an RFTUK position. Assistance and participation must not be conditional on a preferred account.

13. Media, recruitment and personal relationships

RFTUK must not provide personal benefits in exchange for favourable independent journalism. Legitimate paid advertising or sponsorship must be distinguished from editorial coverage.

Employment, contracts, volunteer opportunities or benefits for relatives must never be used as inducements. Genuine gifts from family or friends are ordinarily private, but must be declared if linked to an RFTUK decision or an attempt to influence one.

14. Travel, expenses and reasonable support

RFTUK may approve reasonable travel, subsistence and accommodation for genuine organisational activity, with documentation and normal financial controls. Luxury, family extras or benefits offered to third parties need special scrutiny.

Reimbursement of genuine expenses is not bribery merely because money changes hands. Fabricated or inflated claims must be refused and referred for review.

15. Directors' duties and conflicts

Directors must comply with applicable Companies Act 2006 duties, including the statutory restriction on benefits from third parties connected with their office, subject to its legal exception. Interests in proposed transactions must be disclosed as legally required.

A declaration is not permission to accept an improper benefit. RFTUK may require an independent decision or recusal where a conflict risks undermining trust.

16. Warning signs and what to do

Warning signs include unexplained cash; secrecy; false invoices; unusual commissions; supplier-selected intermediaries; gifts to relatives; benefits immediately before decisions; requests to bypass approval; unofficial payments; and rewards tied to favourable treatment. A warning sign is not proof of bribery but must be reviewed.

If an improper benefit is offered, refuse it where safe, do not conceal it, preserve relevant details and escalate to an authorised unconflicted person. Where there is immediate personal danger, prioritise safety.

17. Speaking up, complaints and non-retaliation

Concerns about bribery, corrupt payments, supplier inducements or inappropriate benefits may be raised using the RFTUK Contact Us page or through its governance and complaints procedures. Reports should preserve relevant dates, messages, invoices, identities and payment details without conducting an unsafe private investigation.

RFTUK will not retaliate against good-faith reporters. An unproven concern is not automatically malicious; knowingly fabricated allegations may be addressed through fair conduct procedures. Where possible, the person whose conduct is questioned should not be the sole investigator.

18. Investigations, preservation and referrals

Credible concerns should be investigated fairly and proportionately. Appropriate steps may include freezing access, pausing payments, protecting witnesses, preserving records, reviewing conflicts, consulting advisers and notifying a bank or payment provider.

Serious suspected criminal activity may require referral to police, the Serious Fraud Office or other appropriate authorities. Interim protective steps are not final findings of guilt; RFTUK must not hide suspected crime merely to protect its reputation.

19. Records, privacy, training and review

Keep accurate proportionate records of material offers, approvals, due diligence, conflicts, reports and action taken. Protect personal and confidential information under the Data Protection & GDPR Policy; records must not be altered or destroyed to conceal a concern.

Relevant staff and volunteers should receive practical guidance for their roles, particularly in finance, fundraising, sponsorship, procurement and lobbying. Review this policy at least annually and after material legal or bribery-risk changes.

20. PCS application, contacts and related policies

Parent Contribution Service (PCS) is operated by Right First Time UK Ltd, not a separate company. It supports voluntary parent-to-parent arrangements; under the current model RFTUK/PCS does not receive, hold or transfer the parents' child-contribution money or exercise statutory enforcement powers. PCS access fees are RFTUK service income and separate from those contributions.

Gifts, incentives or favours must never influence PCS records, service decisions, complaints or account access. See the Conflict of Interest, Financial Controls & Expenses, Donation Transparency, Fundraising, Governance, Complaints and Lobbying Parliament & Political Independence policies.

For a concern, request or complaint use <https://rightfirsttimeuk.com/contact-us.php> or email complaints@rightfirsttimeuk.com.

Official guidance

Bribery Act 2010

Ministry of Justice: Bribery Act guidance

GOV.UK: Director duties

CPS / SFO: Bribery Act joint prosecution guidance

Electoral Commission: Non-party campaigners

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