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# Fraud, Bribery and Corruption Prevention policy

## UNRESTRICTED

*This policy was approved by the Standing Committee on 1 September 2016 (with minor amendment on 29 October 2018) and will be reviewed not later than 2020.*

### 1. Policy principles

- 1.1 The British Museum requires all Trustees, staff, volunteers, contractors and any other authorised representatives to act with honesty and integrity and to safeguard the public resources for which the Trustees are responsible.
- 1.2 The Museum will not accept any level of fraud, bribery or corruption; consequently, any instance or suspected instance of fraud, bribery or corruption will be thoroughly investigated and dealt with appropriately. The Museum will not penalise any member of staff who refuses to pay any bribe.
- 1.3 Members of the public may report suspicions fraud, bribery or corruption affecting Museum operations to [info@britishmuseum.org](mailto:info@britishmuseum.org) or write to The British Museum, Great Russell Street, London WC1B 3DG
- 1.4 The Museum will respond to and manage the risks from fraud, bribery and corruption through a system of internal control which identifies principal risks, evaluates the nature and extent of those risks and manages them effectively.
- 1.5 As a Non-Departmental Public Body, the Museum follows Annex 4.9 of the Treasury's *Managing Public Money* in relation to fraud.
- 1.6 Further guidance on the application of this policy can be found in the Fraud, Bribery and Corruption Prevention procedure, the Finance

Operating Manual, the Standards of Conduct policy, the Code of Conduct for Staff and the Disciplinary procedure.

## 2. Definitions

- 2.1 Criminal offences involving fraud are encapsulated in the Fraud Act 2006. However, the term “fraud” is generally used to describe action which involves depriving someone else of something by dishonesty. It may refer to deceitful acts such as deception, forgery, extortion, corruption, theft, conspiracy, embezzlement, misappropriation, false representation, concealment or dishonest alteration of material facts and collusion.
- 2.3 Offences in relation to bribery are set out in the Bribery Act 2010. The Act is applicable to bribery within the UK and internationally and includes an offence of negligently failing to prevent bribery within an organisation, or by anyone authorised to act of its behalf. The Act also makes it an offence to make unauthorised payments to foreign public officials.

## 3. Responsibilities and procedures

- 3.1 The Director in his role as the Accounting Officer is responsible for establishing and maintaining a sound system of internal control that supports the achievement of Museum policies, aims and objectives.
- 3.2 The Museum maintains a Fraud, Bribery and Corruption Prevention procedure setting out the process for reporting suspicions and conducting investigations.
- 3.3 Responsibility for the management of the risk of fraud, bribery and corruption is delegated to various officers of the Museum as detailed in the Fraud, Bribery and Corruption Prevention procedure.

## 4. Gifts and hospitality

- 4.1 Paragraphs 2.16–2.17 of the Code of Conduct for Staff set out the responsibilities and obligations of Museum staff when accepting gifts, rewards, hospitality and awards. Further Guidance for staff is contained in the Museum’s Finance Operating Manual.