



## Anti-Bribery & Anti-Corruption Policy

This policy applies to all staff of Abbot's Hill, including EYFS.

This policy applies to all individuals working for the school at all levels (whether permanent, fixed-term or temporary), and includes Governors, volunteers, agents or any other person associated with these individuals (collectively referred to as "workers" in this policy).

### 1. Introduction

- 1.1 It is the school's policy to conduct all of our business in an honest and ethical manner. We take a zero-tolerance approach to bribery and corruption and are committed to acting professionally, fairly and with integrity in all our business dealings and relationships wherever we operate and implementing and enforcing effective systems to counter bribery. The school will comply with the Bribery Act 2010, in respect of our conduct both at home and abroad.
- 1.2 The purpose of this policy is to:
  - a) set out the school's responsibilities, and of those working for us, in observing and upholding our position on bribery and corruption; and
  - b) provide information and guidance to those working for us on how to recognise and deal with bribery and corruption issues.
- 1.3 Bribery and corruption are punishable for individuals by up to ten years' imprisonment and if they are found to have taken part in corruption, the school could face an unlimited fine, be excluded from tendering for public contracts and face damage to its reputation. The school, therefore, takes its legal responsibilities very seriously.
- 1.4 In this policy, "third party" means any individual or organisation which staff come into contact with during the course of their work, and includes actual and prospective pupils and parents, suppliers, business contacts, agents, advisers, and government and public bodies.

### 2. What is bribery?

- 2.1 Bribery is inducement or reward offered, promised or provided in order to gain any business or personal advantage.
- 2.2 The following are examples of circumstances in which offences under the Act may occur:
  - An IT company providing services to the school offers a member of staff a free iPad as an incentive for renewing its contract for services.
  - A ski company tendering for a contract with the school offers to accommodate a teacher's child on the trip free of charge.
  - A request or offer of a reduction in school fees at another school in return for an expectation that the member of staff would induce other families to accept places at the other school.
- 2.3 Accepting any of the above offers identified above may amount to an offence under the Act.

### **3. Gifts and hospitality**

3.1 This policy does not prohibit normal and appropriate hospitality (given and received) to or from third parties.

3.2 The giving or receiving of gifts or hospitality is not prohibited, if the following requirements are met:

- It is not made with the intention of influencing a third party to obtain or retain business or a business advantage, or to reward the provision or retention of business or a business advantage, or in explicit or implicit exchange for favours or benefits;
- It complies with local law;
- It is given in the school's name, not in your name;
- It is appropriate in the circumstances. For example, it is customary for small gifts to be given at Christmas time;
- Taking into account the reason for the gift, it is of an appropriate type and value and given at an appropriate time;
- It is given openly, not secretly; and
- Gifts should not be offered to, or accepted from, government officials or representatives without the prior approval of the Bursar or the Head.

3.3 From time to time, parents or pupils may offer staff gifts on an individual basis as a demonstration of their gratitude for the work done on their behalf, and this is perfectly legitimate. However, in some contexts such gifts could be construed as an improper inducement to, for instance, accord preferential treatment in the future. Consequently, it is necessary for the school to have rules applying to such gifts. These are as follows.

- Any gifts received, of whatever value, should be reported to the Bursar via email;
- The Bursar will exercise her discretion as to the appropriate treatment of the gift;
- However as a guideline, it is expected that occasional gifts to staff from parents of up to £100 in value (including money or gift vouchers) would normally be approved;
- Gifts that are worth more than £100, or which appear inappropriate for any reason, will be donated to the school or the school's nominated charity or returned to the donor;
- In all relevant cases, the parent should be thanked for their gift and informed that it is being donated to the school or school's nominated charity.

3.4 Gifts received from suppliers can be retained if they are token work-related items e.g. pens, notepads, flash drives, desk calendars or diaries. Any other gifts should be politely refused or donated to the school or school's nominated charity. In either case, the Bursar should be notified by email, and if the gift is being donated to charity then the donor should be told that this is the case.

### **4. What is not acceptable?**

4.1 It is not acceptable for a member of staff (or someone on their behalf) to:

- Give, promise to give, or offer, a payment, gift or hospitality with the expectation or hope that an advantage for the school will be received, or to reward an advantage already received;
- Give, promise to give, or offer, a payment, gift or hospitality to a government official, agent or representative to "facilitate" or expedite a routine procedure;

- Accept payment from a third party that you know or suspect is offered with the expectation that it will obtain an advantage for them;
- Accept a gift or hospitality from a third party if the recipient knows or suspects that it is offered or provided with an expectation that a business advantage will be provided by the school in return;
- Threaten or retaliate against another worker who has refused to commit a bribery offence or who has raised concerns under this policy; or
- Engage in any activity that might lead to a breach of this policy.

## **5. Donations**

5.1 The school only makes charitable donations that are legal and ethical under local laws and practices. No donation must be offered or made in the school's name or on behalf of the school without the prior approval of the Head or the Bursar.

## **6. Your responsibilities**

6.1 Staff must ensure that they read, understand and comply with this policy.

6.2 The prevention, detection and reporting of bribery and other forms of corruption are the responsibility of all those working for or under the control of the school. All workers are required to avoid any activity that might lead to, or suggest, a breach of this policy.

6.3 The school could be held liable for failing to prevent bribery if a person associated with it commits an offence under the Act. All staff must notify the Head or the Bursar as soon as possible if they believe or suspect that a breach of this policy has occurred, or may occur in the future, or if they consider that they have been offered any inducement or reward with a view to obtaining a business or personal advantage.

6.4 Any employee who breaches this policy may face disciplinary action, which could result in dismissal for gross misconduct. The school reserves the right to terminate its contractual relationship with other workers if they breach this policy.

## **7. Record-keeping**

7.1 The school keeps financial records and has appropriate internal controls in place which will evidence the business reason for making payments to third parties.

7.2 All employees must make their line manager aware and keep a written record of all hospitality or gifts accepted or offered, which will be subject to managerial review.

7.3 Staff must ensure all expenses claims relating to hospitality, gifts or expenses incurred in relation to third parties are submitted in accordance with the school's expenses policy and specifically record the reason for the expenditure.

7.4 All accounts, invoices, memoranda and other documents and records relating to dealings with third parties, such as clients, suppliers and business contacts, should be prepared and maintained with strict accuracy and completeness. No accounts must be kept "off-book" to facilitate or conceal improper payments.

## **8. How to raise a concern**

8.1 All staff are encouraged to raise concerns about any issue or suspicion of malpractice at the earliest possible stage. Concerns should be reported by following the procedure set out in the Whistleblowing Policy.

## **9. Protection**

9.1 Workers who refuse to accept or offer a bribe, or those who raise concerns or report another's wrongdoing, are sometimes worried about possible repercussions. The school aims to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken.

9.2 The school is committed to ensuring no one suffers any detrimental treatment as a result of refusing to take part in bribery or corruption, or because of reporting in good faith their suspicion that an actual or potential bribery or other corruption offence has taken place, or may take place in the future. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. Staff who believe that they have suffered any such treatment should use the school's Grievance Procedure.

## **10. Training and communication**

10.1 Training on this policy forms part of the induction process for all new workers. All existing workers will receive regular, relevant training on how to implement and adhere to this policy.

### **Signed**

Issue Date: June 2019

Review Date: June 2020 or earlier if major change



Mrs Kathryn Gorman  
**Head**