



Bribery Policy Whole school and EYFS

The Head undertakes a formal annual review of this policy for the purpose of monitoring and of the efficiency with which the related duties have been discharged, by no later than one year from the date shown below, or earlier if significant changes to the systems and arrangements take place, or if legislation, regulatory requirements or best practice guidelines so require.

Signed: Dr Pamela Edmonds

Date reviewed: September 2023

Date of next review: September 2024

Introduction

Bribery is an inducement or reward offered, promised or provided to gain personal, commercial, regulatory or contractual advantage. Bribery is a criminal offence and can result in imprisonment or substantial fines.

The Bribery Act 2010 identifies four categories of offence as follows:

- Offering, promising or giving a bribe.
- Requesting, agreeing to receive or accepting a bribe.
- Bribing a public official to obtain or retain business.
- Failing to prevent bribery.

This policy applies to all employees and to anyone associated with the school including agents, representatives, suppliers and contractors. All are required to:

- read, understand and comply with this policy
- act honestly and with integrity at all times and to safeguard the school's resources for which they are responsible
- avoid activity that breaches this policy

Statement

The school recognises its duties under the Bribery Act 2010 and prohibits the offering, giving, solicitation or acceptance of a bribe or improper inducement, whether cash or any other inducement, to or from any person or company wherever they are situated in order to gain personal advantage of any kind for the individual or anyone connected with the individual. The school is committed to the prevention, deterrence and detection of bribery and will inform the Police and any other relevant body of any bribe or improper inducement of which it may become aware.

Specific Guidance

Gifts: please refer to the Code of Conduct for guidance on the acceptance of gifts. A register of gifts over the value of £100 is kept by the school administrator.

Hospitality & Entertainment: normal and appropriate hospitality is considered an accepted part of school practice, such as the provision of refreshments to prospective pupils and parents. However,



lavish corporate hospitality such as restaurant meals, tickets to sporting events, foreign travel invitations and costly presents, provided by the school may be an offence under the Bribery Act 2010 if it is used to secure an advantage.

The acceptance by an employee of lavish hospitality provided by a parent or external body may constitute a bribe or improper inducement. An employee who is invited to what he/she considers to be lavish hospitality or entertainment must not accept an invitation without first gaining approval from the school administrator and specifying the nature of the gift and the circumstance in which it is offered. If in the reasonable opinion of the school administrator, acceptance of the invitation is inappropriate, you must decline it.

Discounts for Goods & Services: discounts for goods and services offered by a supplier to the school must not be accepted by an employee as a personal benefit. All discounts from suppliers for orders made by Purchase Orders or on other contract agreements are acceptable provided that the school itself receives the discount.

Pupil recruitment agents: the school does not permit a payment or other inducement other than that in accordance with the contract for service of that agency to be made to an agent acting on behalf of the school in the recruitment of pupils

Public Officials: the school does not permit a payment or other inducement to be made to any public official, in the UK or elsewhere, to facilitate a personal benefit of its employees or pupils unless he payment is a written legal requirement.

Monitoring

The school administrator is responsible for monitoring the school's compliance to this policy and should be the first point of contact for any questions relating to bribery.

Non-compliance

An employee in breach of this policy may face disciplinary action in accordance with the disciplinary procedure and which may result in summary dismissal for gross misconduct, as well as facing possible civil and/or criminal prosecution. Any agents, representatives, suppliers or contractors in breach of this policy who commits a bribery-related offence or causes the school to do so may have their contract with the school terminated.