



Anti-Bribery and Anti-Corruption Policy

Introduction

Bribery is defined as giving or taking a reward in return for acting dishonestly and/or in breach of the law. Corruption means illegal, immoral or dishonest behaviour.

Under the Bribery Act 2010, it is an offence to:

- bribe another person directly or through a third party including offering or promising financial or another advantage with the intention of getting a reward in return of such activity.
- request, accept or receive a bribe
- bribe a foreign public official
- not prevent bribery by a commercial organization (by its employees or other individuals associated with it)

Individuals associated with the School include agents and intermediaries, subsidiaries (including those overseas), joint venture and consortium partners, contractors, and other third party service providers.

Under section 7 of The Bribery Act 2010, a commercial organization would commit an offence by failing to prevent employees or other individuals associated with them from committing bribery on the organization's behalf. The Act covers all companies incorporated or formed in the UK or those that carry out business in the UK.

Purpose and Scope

The purpose of the policy is to provide clear guidelines to all employees and individuals associated with the School. The School is committed to be fair and honest in its dealings with clients, customers and suppliers and adopts a zero tolerance approach towards bribery.

The policy covers all personnel including permanent, temporary, agency staff and contractors.

The School expects its business partners and suppliers to act with integrity and without bribery and/or corruption. The School shall include clauses to this effect in relevant contracts.

Guidelines

Based on the six principles of the Act, the School shall:

- Establish a code of conduct dealing with key risk areas including gifts, corporate hospitality, facilitation payments, political and charitable donations, sponsorships and other related activities.
- Introduce a due diligence procedure. This would include conducting investigation or research, monitoring persons associated with the School, close monitoring of the recruitment process and following up on business references. For example, the process of selection of a recruitment firm must be transparent and fair.

- Establish stringent financial controls including multiple authorisations for significant transactions and close monitoring of hospitality and promotional expenses, charitable and political donations.

Procedure

- The Compliance Officer responsible for the School's anti-bribery and anti-corruption policy is the Head Teacher. Staff must contact the Compliance Officer for any queries.
- Risk assessments of situations where bribery could occur and identifying action points. The level of risk will depend on the nature of the business, countries where the School carries out its business, persons associated with the School. For example, offers of rebate or incentive to use services of recruitment, HR or other service providers could constitute a bribe.
- Where an employee believes that he/she has been offered a bribe by a third party or if asked to make one, suspect that this may happen in the future, or that he/she believes they are a victim of another form of unlawful activity, this must be reported immediately to the Compliance Manager or directly to the Head Teacher.
- For the avoidance of doubt, this includes reporting the employee's own wrongdoing. The duty to prevent, detect and report any incident of bribery and any potential risks rests not only with the Head Teacher but equally with all employees and associated persons.
- When an employee believes that an offence has been committed that relates to bribery or corruption, the employee must raise it through the School's Whistleblowing Policy.
- Individuals associated with the School who wish to report an act of bribery must immediately contact the Head Teacher of the School directly. Should they believe that it may be beyond the scope of the School, they must report to the relevant legislative body.
- Where any incident of alleged bribery or corruption has been reported, it will be investigated thoroughly and dealt with through the School's disciplinary procedure.
- Confidential information pertaining to the School must not be disclosed to a third party, either during or after the employment has ended. This information includes information on the School's present or potential customers or suppliers and any information relating to the business.
- Acts of bribery or corruption will be treated as gross misconduct and could lead to summary dismissal.

Gifts and Corporate Hospitality

Gifts and hospitality include the receipt or offer of gifts, meals, other forms of appreciation and gratitude, invitations to events or other social gatherings, in connection with matters related to the School's business. As long as they are within reasonable limits, they are acceptable. The following situations are unacceptable and will be classified as a bribe:

- 'quid pro quo' (offer for something in return)
- gifts in the form of cash or cash equivalent vouchers
- entertainment of a sexual or similarly inappropriate nature

Any act which cannot be justified and can be construed as unethical must be referred to the Compliance Officer first. Expenses must be proportionate and reasonable to the business of the School and shall be paid on receipt of bills.

Some examples that may be deemed as a bribe:

- Presenting or receiving an expensive gift
- Spending excessive amount on Third Party entertainment
- Not reporting any expenditure within the School that is of value over £20
- Receiving personal discounts or other benefits from suppliers or clients or third parties

All employees have a responsibility to raise any concerns relating to bribery or corruption and to ensure they are acting in good faith to protect the interests of the School at all times. Any form of gift or hospitality, given, received or offered, which meets or exceeds the lower limit must be appropriately recorded in the register kept by the Head Teacher.

Facilitation Payments, Commission Payments and Donations

Facilitation payments are small level payments, usually made to a government official, to facilitate a routine action or process, for example, obtaining a permit. Under the Act, facilitation payments are illegal. The School does not condone such payments.

Commission payments made in return for services are acceptable as long as they are not significantly disproportionate to the value of the service. The School shall maintain accurate records of any such payments along with an explanation of how the rates are calculated.

Before making any charitable or political donations or sponsorship agreements, the School shall carry out relevant checks including verifying bank accounts, to ensure legitimacy of the transaction. All such payments must be recorded in official books of the School.

Any kind of solicitation or request for solicitation must be reported to the Head Teacher.

Implementation, Monitoring and Record keeping

The implementation of this policy will be reviewed annually in respect of its suitability, adequacy and effectiveness and make improvements as appropriate.

Training and communication

All employees will be provided with training on bribery as part of their induction. Employees are also expected to read this policy.

Reviewed August 2018 SFBC/AC

Reviewed June 2019 SFBC

Reviewed August 2020 SFBC