



Sidcot
Live Adventurously

Policy Name: Anti Bribery Policy

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1. About this Policy

1.1 It is the policy of Sidcot School (the School) to conduct all of its business in an honest and ethical manner in accordance with its Quaker ethos and principles. In recognition of these principles, its legal obligations and for reputational reasons, the School takes a zero-tolerance approach to bribery and corruption and is committed to acting professionally, fairly and with integrity in all its business dealings and relationships.

1.2 Specifically, the School will not tolerate: the improper authorisation, offer, promise, payment or giving of money or anything else of value for the purpose of obtaining or retaining business, or for any other improper or business advantage; the solicitation, acceptance or receipt of any bribe or kickback; the making of any unlawful payment through a third party; the unlawful use of School funds; and any retaliatory action in answer to an offer of a bribe or a refusal to accept a bribe. The School's policy is to encourage all to raise concerns and report violations as early as possible.

1.3 Any employee who breaches this policy will face disciplinary action, which could result in dismissal for gross misconduct. Any non-employee who breaches this policy may have their contract or office terminated with immediate effect.

2. Who must comply with this Policy?

2.1 This policy applies to all persons working for or on the School's behalf in any capacity, including employees at all levels, Governors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives and business partners.

2.2 The School will give anyone considered to be in a position where they are vulnerable to being offered bribes a copy of this policy reinforced with periodic verbal briefings.

3. Distribution

3.1 This policy is available on the intranet and website, and in hard copy form when requested free of charge

3.2 The School also provides the policy to educational agencies who recruit students from the U.K. and abroad.

4. What is Bribery and Corruption?

4.1 Bribe means a financial or other inducement or reward for action which is illegal, unethical, a breach of trust or improper in any way. Bribes can take the form of money, gifts, loans, fees, hospitality, services, discounts, the award of a contract or any other advantage or benefit. Corruption is defined as the "deliberate use of one's position for direct or indirect illegitimate personal gain".

4.2 Bribery includes offering, promising, giving, accepting or seeking a bribe.

4.3 All forms of bribery are strictly prohibited. If you are unsure about whether a particular act constitutes bribery, raise it with the Headmaster or the Chair of the Governors.

4.4 Under the Bribery Act 2010, both individuals and organisations are liable for conviction in court, imprisonment and/or fines if found guilty of an offence;

4.5 Specifically, you must not:

- Give or offer any payment, gift, hospitality or other benefit in the expectation that a business advantage will be received in return, or to reward any business received;
- Accept any offer from a third party that you know or suspect is made with the expectation that we will provide a business advantage for them or anyone else;
- Give or offer any payment (sometimes called a facilitation payment) to a government official in any country to facilitate or speed up a routine or necessary procedure;
- Turn a blind eye to, disregard or fail to report any indication of improper inducements;
- Do anything to assist or induce anyone else to break these rules.
- The School recognises that the greatest risk of offers of bribes arises from certain overseas agencies where such practices are commonplace. The School will regularly warn those staff most likely to be placed in position of being offered bribes (in particular those in Marketing and Admissions) of the consequences of such actions.

4.6 You must not threaten or retaliate against another person who:

- Has refused to offer or accept a bribe; or
- Has raised concerns about possible bribery or corruption ¹

5. Gifts and Hospitality

5.1 This policy does not prohibit the giving or accepting of reasonable and appropriate hospitality for legitimate purposes such as building relationships, maintaining the School's image or reputation, or marketing its services. There are further details in the School's policy 9.16 – The Receipt of Gifts and Hospitality Policy.

5.2 A gift or hospitality will not be appropriate if it is unduly lavish or extravagant, or could be seen as an inducement or reward for any preferential treatment (for example, during contractual negotiations or a tender process).

5.3 Gifts must be of an appropriate type and value depending on the circumstances and taking account of the reason for the gift. Gifts must not include cash or cash equivalent (such as vouchers) unless given to you from the whole class as a present, or be given in secret. If you make a gift, do so in the School's name, not your name. All gifts of a value of £50 or more, whether given or received, must be declared in accordance with the Receipt of Gifts and Hospitality Policy.

5.4 You may give promotional gifts of low value such as branded stationery to or accept such gifts from existing customers, suppliers and business partners.

6. Record-keeping

6.1 You must declare and keep a written record of all hospitality or gifts over £50 given or received (see Receipt of Gifts Policy 9.16).

6.2 You must also submit all expenses claims relating to hospitality, gifts or payments to third parties in accordance with the School's Expenses Policy 9.28 and record the reason for expenditure.

6.3 All accounts, invoices, and other records relating to dealings with third parties including suppliers and customers should be prepared with strict accuracy and completeness. Accounts must not be kept "off-book" to facilitate or conceal improper payments.

7. How to Raise a Concern

7.1 If you are offered a bribe, or are asked to make one, or if you suspect that any bribery, corruption or other breach of this policy has occurred or may occur, you must notify the Headmaster or the Chair of the Governors OR report it in confidence in accordance with the School's Whistleblowing Policy 9.9 as soon as possible.

8. Review

8.1 This policy is reviewed by the Board of Governors every 3 years, unless incident or change or legislation/guidance requires an earlier review

9. Document Change History – document any changes since 27 January 2015 – new version adopted by the board

Date of change	Detail significant changes and any new legislation / guidance taken into account
18.06.2016	Board reviews and adopts policy, new format, clarification of wording (paragraph 6), and clarification of how policy is to be distributed (paragraph 7).
12.03.2019	Reviewed in conjunction with 9.16, Receipt of Gifts Policy by Board of Governors. 1.2 Redrafted 4.4 Under the Bribery Act 2010, both individuals and organisations are liable for conviction in court, imprisonment and/or fines if found guilty of an offence; 4.5 Additions to staff must not: Turn a blind eye to, disregard or fail to report any indication of improper inducements; Do anything to assist or induce anyone else to break these rules. 5.3 Gifts must be of an appropriate type and value depending on the circumstances and taking account of the reason for the gift. Gifts must not include cash or cash equivalent (such as vouchers) unless given to you from the whole class as a present, or be given in secret. If you make a gift, do so in the School's name, not your name. All gifts of a value of £50 or more must be declared in accordance with the Receipt of Gifts and Hospitality Policy.