



*inspirans flammam
posteritatis*

**ROSEMEAD
PREPARATORY
SCHOOL & NURSERY**

DULWICH

P18 - ANTI-CORRUPTION AND BRIBERY POLICY

(INCLUDING EYFS)

INTRODUCTION

It is the policy of Rosemead Preparatory School to conduct its 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 in implementing and enforcing effective systems to counter bribery. Rosemead Preparatory School will comply with the Bribery Act 2010 in respect of its conduct wherever that may take place.

Bribery and corruption are punishable for individuals by up to ten years' imprisonment and if we are found to have taken part in corruption Rosemead Preparatory School could face an unlimited fine and damage to its reputation. We therefore take our legal responsibilities very seriously.

AIM

The aim of this policy is to:

- set out the responsibilities of Rosemead Preparatory School, and of those working for us, in observing and upholding our position on bribery and corruption
- provide information and guidance to those working for us on how to recognise and deal with bribery and corruption issues

DEFINITION

In this policy, 'third party' means any individual or organisation that members of staff come into contact with during the course of their work for Rosemead Preparatory School, and includes actual and prospective pupils and parents, suppliers, business contacts, agents, advisers, and government and public bodies.

WHO IS COVERED BY THE POLICY?

This policy applies to all individuals working for Rosemead Preparatory School at all levels (whether permanent, fixed-term or temporary), and includes governors, volunteers, agents or any other person associated with Rosemead Preparatory School (collectively referred to as 'members of staff' in this policy).

WHAT IS BRIBERY?

A bribe is an inducement or reward offered, promised or provided in order to gain any business or personal advantage.

GIFTS AND HOSPITALITY

This policy does not prohibit normal and appropriate hospitality, given and received, to or from third parties. Thus the giving or receipt of gifts or hospitality is not prohibited, if the following requirements are met:

- it is not done 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 the law
- it is given in Rosemead Preparatory School name, not in a member of staff's name
- it is appropriate in the circumstances. For example, in the UK 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

- gifts should not be offered to, or accepted from, government officials or representatives without the prior approval of the Head

We appreciate that the practice of giving business gifts varies between countries and regions and what may be normal and acceptable in one region may not be in another. The test to be applied is whether in all the circumstances the gift or hospitality is reasonable and justifiable. The intention behind the gift should always be considered.

WHAT IS NOT ACCEPTABLE?

It is not acceptable for members 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 Rosemead Preparatory 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 they 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 they know or suspect that it is offered or provided with an expectation that a business advantage will be provided by Rosemead Preparatory School in return
- threaten or retaliate against another member of staff who has refused to commit a bribery offence or who has raised concerns under this policy
- engage in any activity that might lead to a breach of this policy

DONATIONS

Rosemead Preparatory School only makes charitable donations that are legal and ethical. No donation must be offered or made in Rosemead Preparatory School's name or on behalf of Rosemead Preparatory School without the prior approval of the Head.

MEMBERS OF STAFF' RESPONSIBILITIES

Members of staff must ensure that they read, understand and comply with this policy.

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

A member of staff must notify the Head and should that be inappropriate, the Chair of Board of Governors, as soon as possible if he/she believes or suspects that a breach of this policy has occurred, or may occur in the future.

Any member of staff who breaches this policy will face disciplinary action, which could result in dismissal for gross misconduct. We reserve our right to terminate our contractual relationship with other members of staff if they breach this policy.

RECORD-KEEPING

Rosemead Preparatory School keeps financial records and has appropriate internal controls in place, which will evidence the business reason for making payments to third parties.

All members of staff must make their line manager aware of hospitality or gifts accepted or offered and are to record all such over a value of £100 in the Hospitality Book or email declarations held by Finance. This book and emails will be subject to managerial review on a regular basis and will be presented to Rosemead Preparatory School's auditors for annual review.

Members of staff must ensure all expenses claims relating to hospitality, gifts or expenses incurred to third parties are submitted to Finance and are to record the reason for the expenditure.

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.

HOW TO RAISE A CONCERN

Members of staff are encouraged to raise concerns about any issue or suspicion of malpractice at the earliest possible stage. Concerns should be reported to the Head and should that be inappropriate to the Chair of Board of Governors.

PROTECTION

Members of staff who refuse to accept or offer a bribe, or those who raise concerns or report another's wrongdoing, are sometimes worried about possible repercussions. Rosemead Preparatory 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.

Rosemead Preparatory 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. If a member of staff believes that he/she has suffered any such treatment, he/she should use the School's Grievance Procedure.

TRAINING AND COMMUNICATION

Training on this policy forms part of the induction process for all new members of staff. All existing members of staff will be made aware of this policy on at least an annual basis.

RELATED POLICIES

Gifts and Hospitality Policy
Whistleblowing Policy
Managing Conflict of Interest Policy

P18 – Anti-Corruption and Bribery Policy			
Author/s:		Date Reviewed:	Lent 2022
Date Ratified:	Lent 2022	Next Review Date:	Michaelmas 2023
Committee:	Finance and Resource	Clerk to the Governors Signature:	