



Policy Name: Anti-Corruption and Bribery Policy

Owner: Head of HR

Date Last Reviewed: Sept 2025

Date of Next Review: Sept 2027

Policy revised biennially or as regulations or review demands

1. POLICY STATEMENT

Mayfield School ("the School", "we" or "us") has a policy of conducting all its business in an honest and ethical manner and to act in good faith. We take a 'zero-tolerance' approach to bribery and corruption. We are committed to acting professionally, fairly and with integrity in all our business dealings and relationships wherever we operate and we are committed to implementing and enforcing effective systems to counter bribery.

We will uphold all laws relevant to countering bribery and corruption. Most notably, we remain bound by the laws of the UK, including the Bribery Act 2010, in respect of our conduct both at home and abroad.

The purpose of this Policy is to:

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

We have identified the following examples as particular risks for our business:

- Accepting payment or donations in return for securing a place for a particular child or the appointment of a particular child to a position within the School, without following the School's usual admissions and appointment procedures.
- Accepting an invitation from a supplier or a parent to attend an event as their guest where the supplier or parent intends to secure an improper advantage (in this case, the offence would be committed by the supplier or parent, although there is a reputational risk to the School. If the employee acted improperly as a result, the employee would then also have committed an offence).
- Accepting a lavish gift or gifts which induce someone to favour one particular pupil over others.
- Accepting a charitable donation from a business tendering for a contract with the School or its subsidiaries or favouring donors when choosing suppliers.
- Accepting personal gifts or stock personally from suppliers of products in order to induce the School to keep them as a supplier.

To address those risks we have:

- Ensured the School governing body is aware of the legislation and how it applies to the School.
- Ensured that the Senior Leadership Team of the School is also aware of the legislation and appointed the Head of HR as the Officer in charge of compliance with the legislation on a day-to-day basis.
- Communicated this Policy to all staff and held meetings with workers who are thought to be most at risk of being induced with bribes – in addition to the Senior Leadership Team, the Heads of School/Year and those responsible for significant purchasing responsibilities; admitting students, including overseas recruitment; awarding scholarships and bursaries; dealing with unpaid debts and liaising with donors.
- Posted this Anti-Bribery policy on the School website to communicate the Policy to current and potential parents, suppliers and business partners.
- Amended the School "Whistleblowing" Policy to ensure it refers to the Bribery Act.
- Added bribery to the list of offences in the School Disciplinary Policy that may constitute gross misconduct for members of staff.

In this policy, third party means any individual or organisation you come into contact with during the course of your work for us, and includes actual and prospective pupils and parents, hirers of the School facilities, other customers, suppliers, distributors, business contacts, agents, advisers and government and public bodies.

2. WHO IS COVERED BY THE POLICY?

This Policy applies to the School and to all individuals working at all levels and grades, including members of the Senior Leadership Team, Governors, academic and support staff (whether permanent, fixed-term or temporary), consultants, contractors, casual workers, agency staff, volunteers, agents, sponsors, or any other person associated with us, or any of our subsidiaries or their employees, wherever located (collectively referred to as “persons” in this Policy).

3. WHAT IS BRIBERY?

A bribe is an inducement or reward offered, promised or provided in order to gain any improper commercial, contractual, regulatory or personal advantage.

4. YOUR RESPONSIBILITIES AS AN EMPLOYEE, OR INDIVIDUAL ASSOCIATED WITH THE SCHOOL

You must ensure that you 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 persons are required to avoid any activity that might lead to, or suggest, a breach of this policy.

You must notify the Bursar or Headmistress as soon as possible if you believe or suspect that a conflict with this policy has occurred or may occur in the future. For example, if a client or potential client offers you something to gain a business advantage with us or indicates to you that a gift or payment is required to secure their business. Further "red flags" that may indicate bribery or corruption are set out in the Appendix A.

Any employee 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 persons if they breach this policy.

5. GIFTS AND HOSPITALITY

This policy does not prohibit normal and appropriate hospitality (given and received) to or from third parties. If you intend to host an event or invite anyone to an event in your capacity as a representative of the School, you should first inform and seek approval for the event from the Bursar or Headmistress.

The giving or receipt of gifts 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 is given in the name of the School, not in your name.
- it does not include cash
- if it is appropriate in the circumstances (see below);
- if, 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 Headmistress.

It is acknowledged that parents and pupils may choose to provide staff with modest gifts as a demonstration of their gratitude, 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 of cash or other monetary equivalent (e.g. vouchers) of whatever value, or any other gifts of a value of £100 or over should be discussed with the Headmistress or Bursar via email. Any other gifts of a

value of up to £100 may be retained as generally they are given by parents in recognition of education provided.

- If a gift is received from a group of parents, then the maximum value that can be accepted will be based on an average of £50 per pupil.
- Gifts received from suppliers may 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 giver of the gift should be told that this is the case.

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.

6. RECORD-KEEPING

The School must keep financial records and have appropriate internal controls in place to evidence the business reason for making any payments to third parties.

You must declare and keep a written record of all hospitality or gifts accepted or offered – even if declined (over a value of £100). The Record of Gifts/Hospitality is kept in HR. This will include gifts from parents which are over the value of £100 but which have been sanctioned by the Bursar or Headmistress.

You must ensure that all expenses claims relating to hospitality, gifts or expenses incurred to third parties are submitted in accordance with our expenses policy and specifically record the reason for the expenditure.

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

7. WHAT IS NOT ACCEPTABLE?

It is not acceptable for you (or someone on your behalf) to:

- Give, promise to give, or offer, a payment, gift or hospitality with the expectation or hope that a business advantage will be received, or to reward a business advantage already given.
- 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 a business advantage for them.
- Accept a gift or hospitality from a third party if you know or suspect that it is offered or provided with the expectation that a business advantage will be provided in return.
- Threaten or retaliate against another person 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.

8. FACILITATION PAYMENTS AND 'KICKBACKS'

We do not make, and will not accept, facilitation payments or 'kickbacks' of any kind. Facilitation payments are typically small, unofficial payments made to secure or expedite a routine government action by a government official. They are not commonly paid in the UK but are common in some other jurisdictions. The use of any legal and recognised fast track process that is publicly available on payment of a fee should not be caught by this legislation.

If you are asked to make a payment on our behalf, you should always be mindful of what the payment is for and whether the amount requested is proportionate to the goods or services provided. You should always ask for a receipt which details the reason for the payment. If you have any suspicions, concerns or queries regarding a payment, you should raise these with the Bursar.

Kickbacks are typically payments made in return for a business favour or advantage. All persons must avoid any activity that might lead to, or suggest, that a facilitation payment or 'kickback' will be made or accepted by us.

9. DONATIONS

The School does not make contributions to political parties. We only make charitable donations that are legal and ethical under local laws and practices and typically for the purposes of education. The School may occasionally support fundraising events organised by persons within the School or associated with the School. No donation on behalf of the School must be offered or made without the prior approval of the Bursar.

10. HOW TO RAISE A CONCERN AND WHAT TO DO IF YOU ARE A VICTIM OF BRIBERY OR CORRUPTION

You are encouraged to raise concerns about any issue or suspicion of malpractice at the earliest possible stage. If you are unsure whether a particular act constitutes bribery or corruption, or if you have any other queries, these should be raised with the Bursar. Concerns should be reported by following the procedure set out in the School's Whistleblowing Policy. It is important that you tell the Bursar as soon as possible if you are offered a bribe by a third party, are asked to make one, suspect that this may happen in the future, or believe that you are a victim of another form of unlawful activity.

11. PROTECTION

We are committed to ensuring no one suffers any disadvantage 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. If you think that you have suffered such a disadvantage, you should inform the Headmistress or Bursar. If the matter is not remedied, and you are an employee, you should raise it formally using the School Grievance Procedure.

12. TRAINING AND COMMUNICATION

Raising awareness of this Policy forms part of the induction process for all new employees and other persons. All existing employees will receive regular training on how to implement and adhere to this Policy.

Our 'zero-tolerance' approach to bribery and corruption is communicated to all suppliers, contractors and business partners at the outset of our business relationship with them and as appropriate thereafter.

13. WHO IS RESPONSIBLE FOR THE POLICY?

The Board of Governors has overall responsibility for ensuring this Policy complies with our legal and ethical obligations, and that all those under our control comply with it.

The Human Resources Manager has primary and day-to-day responsibility for implementing this Policy and for monitoring its use and effectiveness and dealing with any queries on its interpretation.

The Bursar is responsible for collating examples, monitoring records of gifts and hospitality and as a first point of call for possible concerns.

Management at all levels are responsible for ensuring those reporting to them are made aware of and understand this Policy and are given adequate and regular training on it.

14. MONITORING AND REVIEW

The Governance Committee will monitor the effectiveness and review the implementation of this Policy regularly, considering its suitability, adequacy and effectiveness. Any improvements identified will be made as soon as

possible. Internal control systems and procedures will be subject to regular audits to provide assurance that they are effective in countering bribery and corruption.

Employees and other persons are invited to comment on this Policy and suggest ways in which it might be improved. Comments, suggestions and queries should be addressed to the HR Manager.

This Policy does not form part of any employee's contract of employment and it may be amended at any time.

The School may also report any matter to the relevant authorities including the Director of Public Prosecution, Serious Fraud Office, Revenue and Customs Prosecutions Office and/or the police.

Appendix: A Potential Risk Scenarios: "red flags"

The following is a list of possible red flags that may arise during the course of you working for us and which may raise concerns under various anti-bribery and anti-corruption laws. The list is not intended to be exhaustive and is for illustrative purposes only.

If you encounter any of these red flags while working for us, you must report them promptly to the Headmistress or to the Bursar (or if appropriate using the procedure set out in the Whistleblowing policy):

- being offered payment or donations in return for securing a place for a particular child or the appointment of a particular child to a position within the school, without following the school's usual admissions procedures.
- being invited by a supplier or a parent to attend an event as their guest where you suspect the supplier or parent may intend to secure an improper advantage, or after having gone to the event, any suspicions have arisen.
- being offered a lavish gift or gifts by a parent, supplier or other third party by virtue of your employment in the School.
- being asked for free or subsidised places by senior members of staff at feeder schools.
- being offered a charitable donation from a business which is likely to be tendering for a contract with the school.
- being offered personal gifts or stock by suppliers of products.
- you become aware that a third party engages in, or has been accused of engaging in, improper business practices.
- you learn that a third party has a reputation for paying bribes or requiring that bribes are paid to them.
- a third party insists on receiving a commission or fee payment before committing to sign up to a contract with the School.
- a third-party requests payment in cash and/or refuses to sign a formal commission or fee agreement, or to provide an invoice or receipt for a payment made.
- a third-party request that payment is made to a country or geographic location different from where the third party resides or conducts business.
- a third party requests an unexpected additional fee or commission to "facilitate" a service.
- a third party demands lavish entertainment or gifts before commencing or continuing contractual negotiations or provision of services.
- you receive an invoice from a third party that appears to be non-standard or customised.
- a third party insists on the use of side letters or refuses to put terms agreed in writing.
- you notice that we have been invoiced for a commission or fee payment that appears large given the service stated to have been provided.
- sudden large cash receipts appear in a School bank account that occur other than as a result of normal business operations.