

# Anti-Bribery Policy

Approved by **RET Board**

Approved on **August 2020**

RET contact **Headteacher**

Revision due **Every 2 years**



## 1. Objectives

- a. The aim of the school Anti-Bribery Policy is to set out our business practice and approach for countering bribery.
- b. The Anti-Bribery Policy may be supplemented by additional guidance on specific bribery risks, including a Code of Conduct which provides clear and unambiguous guidance on bribery risks, based upon a detailed bribery risk assessment.

## 2. Our approach

- a. We take a zero-tolerance approach to bribery and are committed to acting professionally, fairly and with integrity in all our business dealings and relationships wherever we operate and implementing and enforcing effective procedures to counter bribery.
- b. Employees are required not to put themselves in any position which might lead to, or suggest, a conflict of interest. Employees are also required not to engage in any form of otherwise unethical or unlawful behaviour.
- c. Certain conduct is automatically prohibited. Prohibited conduct includes facilitation payments; kickbacks; political donations and payments to Public Officials.
- d. Other conduct such as the giving or receiving of any advantage (whether financial or otherwise) such as a gift; invitation; entertainment or hospitality may be permissible depending on the circumstances.
- e. Employees are required to keep a record of gifts and hospitality offered or accepted, which is subject to managerial review.
- f. Any offer of a bribe must be refused and reported to the Headteacher and RET Head of Finance and Operations who will recommend to the police and regulatory authorities.

## 3. Scope

- a. The Anti-Bribery Policy applies to all business practices and conduct both within the UK and overseas, including dealings with government and public bodies, their advisors, representatives and officials, politicians and political parties.
- b. The Anti-Bribery Policy applies to all employees (staff, contract and temporary), Governors, third parties and associated persons acting on our behalf.
- c. The policy extends to all our majority owned business dealings and transactions in countries in all countries in which we or our associates operate.

## 4. Communication of policy

- a. All employees must ensure that they read, understand and comply with the Anti-Bribery Policy.
- b. The Anti-Bribery Policy will be communicated to third parties and incorporated into contractual dealings.

## 5. Personal commitments

- a. Employees are required to avoid any activity that might lead to, or suggest, a breach of the Anti-Bribery Policy.
- b. Employees, third parties and associates are encouraged to raise concerns about any issue or suspicion of malpractice within the scope of the Anti-Bribery Policy at the earliest possible stage. For example, if a distributor or potential supplier offers something to gain an advantage with us, or indicates that a gift or payment is required to secure their business.
- c. Employees who are unsure whether a particular act might constitute bribery, or have any other queries, should raise a query immediately with a line manager or the Headteacher.

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- d. Any concerns relating to the business practices of any employee, third party or associate (for example if you believe or suspect that a conflict with the Anti-Bribery Policy has occurred or may occur in the future) can also be reported by following the procedure set out in our Whistle Blowing Policy. A copy of our Whistle Blowing Policy can be found in our Employee Handbook. All employees receive the protections outlined at section 7 below.
- e. Any employee who breaches this policy will face disciplinary action, which could result in dismissal for gross misconduct.

## 6. Record-keeping

- a. We must keep financial records and have appropriate internal controls in place which will evidence the business reason and justification for any form of advantage received from or made to any third party.
- b. Employees must declare and keep a written record of all hospitality or gifts accepted or offered, which will be subject to managerial review.
- c. Employees must ensure all expenses claims relating to hospitality, gifts or expenses incurred are submitted in accordance with our expenses policy and specifically record the reason for the expenditure.
- d. All accounts, invoices, memoranda and other documents and records relating to dealings with third parties, such as 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 or any form of advantage.

## 7. Responsibilities

- a. The Headteacher has overall responsibility for general oversight including;
  - 1. ensuring the Anti-Bribery Policy and procedures are adequate within the meaning of section 7 Bribery Act 2010 and otherwise comply with our legal and ethical obligations;
  - 2. that all those under our control comply with it;
  - 3. ensuring that the effectiveness of the Anti-Bribery Policy is monitored
  - 4. periodically reviewing the Anti-Bribery Policy

The governing body receives regular reports on bribery compliance from the Headteacher.

- b. The Headteacher shall report to the Governing Body on legal developments in bribery law and bribery compliance. The Headteacher has day-to-day responsibility for implementing the Anti-Bribery Policy, monitoring its use and effectiveness including through audit and investigation of supplier movements and other investigations as appropriate and dealing with any queries on its interpretation.
- c. Line managers are responsible for receiving suspicious activity reports from employees and third parties, promptly passing any such reports to the Headteacher and co-operating with any internal or external investigation.
- d. Managers 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.
- e. Employees are responsible for the prevention, detection and reporting of bribery and other forms of corruption and for honouring the personal commitments at section 6 of the Anti-Bribery Policy.

## 8. Protections

- a. Employees who refuse to accept or offer a bribe, or those who raise concerns or report another's wrongdoing, are sometimes worried about possible repercussions. We aim to encourage openness and will

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support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken.

- b. We are 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 you believe that you have suffered any such treatment, you should inform the Headteacher immediately.
- c. If the matter is not remedied, and you are an employee, you should raise it formally using our Grievance Procedure.

## 9. Implementation

- a. It is every employee's responsibility to counter bribery in our business practices by adhering to the Anti-Bribery Policy.
- b. The Headteacher/ senior leadership team will ensure that all employees receive relevant training. All new employees will be briefed as a part of the induction/welcome orientation.
- c. It is the responsibility of every manager to communicate this policy and ensure that all employees and third parties, within their area of responsibility, understand and comply with the objectives.

## 10. Sanctions

- a. Any violation of the Anti-Bribery Policy or anti-bribery procedures is a cause for disciplinary action, and could lead to dismissal for gross misconduct
- b. No employee will be penalised, or be subject to other adverse consequences for refusing to pay bribes even if it may result in losing business.
- c. We also reserve the right to terminate our contractual relationship with third parties if they breach this policy and/or the Code of Conduct as appropriate. We will in any event report any suspicion of unlawful activity to the regulatory authorities.

## 11. Tax Treatment

- a. The acceptance and giving of invitations or gifts may have tax consequences for employees, recipients and/or the employers. The use and concession of discounts and other price advantages based on contracts or master agreements that the School has entered into may likewise trigger tax consequences.
- b. Employees, third parties and associates must ensure compliance with the prevailing tax regulations on the treatment of accepted and given invitations or gifts and non-monetary benefits. Tax advice shall be obtained to the extent necessary.

## 12. Other matters

- a. Any act of bribery may also amount to an offence under the Fraud Act 2006. For example, falsifying documents or making false statements could amount to fraud by false representation where there is dishonest intent to make a gain on the part of an individual or another, or to cause loss to another or to expose another to a risk of loss.