

# Carlisle & Hampton Hill Federation

## Anti-Bribery and Corruption Policy

*Every child has the right to an education. Primary education must be free and different forms of secondary education must be available to every child.*

UNICEF Article 28 Convention on the Rights of the Child



Statutory Policy:	Yes
Source of policy e.g. AfC	Federation
Date of review:	March 2025
Date of last review:	Autumn 2022
Staff member responsible:	D Fawcett
Governor name & committee responsibility:	Finance and Premises Committee
This policy was ratified by Full Governing Body (if applicable):	
Date next due for review:	March 2028

## **Anti-Bribery and Corruption Policy**

### **Introduction**

Compliance with this policy in relation to bribery and corruption applies equally to all staff and governors. Failure, for any reason, to follow the rules set out in this document may result in disciplinary action being taken which could result in dismissal.

### **Understanding and recognising bribery and corruption**

In the context of school business:

- bribery is the offer or receipt of any gift, loan, payment, reward or other advantage to or from any person as an encouragement to do something which is dishonest, illegal or a breach of trust
- corruption is the misuse of entrusted power for private gain

By engaging in activities which are contrary to UK anti-bribery and corruption legislation, you could face up to 10 years in prison and/or an unlimited fine, and the school could also be liable to an unlimited fine and Government sanction.

### **Key Risk Area**

Bribery can be a risk in many areas of the school. Below are the key areas you should be aware of in particular:

Gifts, entertainment and hospitality: can be used to exert improper influence on decision-makers. Gifts, entertainment and hospitality are acceptable provided they are reasonable and proportionate (see appendix A – termly gift and hospitality register for gifts over £50).

- Gifts are presents such as flowers, vouchers, food and drink. Event and travel tickets given to you as an individual are also gifts when they are not to be used in a hosted business context
- Hospitality includes invitations to hosted meals, receptions and events for business (ie, school) purposes

Record keeping: can be exploited to conceal bribes or corrupt practices. We must ensure that we have robust controls in place so that our records are accurate and transparent.

### **Policy**

This policy document should not be regarded as exhaustive and the specific examples given are by way of illustration. The rules and procedures should be followed at all times; however, if, at any time, you are uncertain as to whether your actions will comply with this policy, you must seek guidance from the headteacher or the Chair of Finance & Premises Committee or the Chair of Governors.

This policy is not intended to prohibit the practice of the giving or receiving of gifts and/or hospitality provided they are appropriate, proportionate and are properly recorded.

You should always act in accordance with the following provisions:

- behave honestly, be trustworthy and set a good example
- use the resources of the school in the best interests of the school, and never misuse those resources
- to avoid any conflict of interest, make a clear distinction between the interests of the school and your private interests, and, if such conflict does arise, you should report it to the headteacher immediately
- ensure that any community support, sponsorship and/or charitable donation cannot constitute bribery - if in doubt, you should consult the headteacher
- never offer or accept bribes
- do not offer or accept any gifts or hospitality from parents, contractors, suppliers, other third parties or public officials if the value of these could be construed as disproportionate and/or unreasonable
- never offer money to any public official in order to speed up service or gain improper advantage. This type of bribery is a 'facilitation payment' and is illegal. If you are faced with a demand for a facilitation payment you must a) actively resist the payment, and b) inform the headteacher or the Chair of Finance & Premises Committee or the Chair of Governors

### **Your responsibility and how to raise a concern**

The prevention, detection and reporting of bribery or corruption is the responsibility of all employees and governors. If you become aware of or suspect that an activity or conduct which is proposed or has taken place is a bribe or corrupt, then you have a duty to report this.

Any such incidents should be reported in accordance the school's whistleblowing policy:

- confidentially report to the Federation headteacher/Head of School or the Chair of Finance & Premises Committee or the Chair of Governors, all incidents, risks and issues which are contrary to this policy
- raise any issues regarding anti-bribery and corruption laws and/or the school's policies with the headteacher or the Chair of Finance & Premises or the Chair of Governors

By complying with this policy document, this will ensure you and the school do not, at any time, knowingly breach any relevant anti-bribery and corruption legislation. In addition, by adhering to this policy, the school can demonstrate that it has adequate procedures in place to prevent such activity.

**You have an obligation to:**

- prevent bribery and corruption in the Federation, and ensure that any interaction with all stakeholders complies with this policy and relevant laws

Please confirm you have read and understood this policy document by signing and dating below:

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## Appendix A

### Private and Confidential

#### HOSPITALITY REGISTER

All staff are requested to complete this form at the end of each term if they are in receipt of any gifts to the value of £50 or more. Please return to the Head of School. nager.

Member of Staff

Term: Autumn term/ Spring / Summer

Received From	Estimated Value ( £50 or more)	Notes