



Alexandra School

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ANTI-BRIBERY POLICY

Date approved: 27 April 2017
Approved by: Full Governing Body
Frequency of review: Every 3 years
Last review: April 2017
Next review due: April 2020

ANTI-BRIBERY POLICY

Introduction

It is the Governing Body of Alexandra School's policy to conduct all of 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 dealings and relationships. We seek to implement and enforce effective systems to counter bribery. We comply with the Bribery Act 2010.

The purpose of this policy is to:

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

In this policy, "third party" means any individual or organisation that staff come into contact with during the course of their work for Alexandra School and includes actual and prospective pupils and parents, suppliers, contacts with other schools and educational bodies, agents, advisers, and local authority, government and public bodies.

Our Commitment

Alexandra School Governing Body commits to:

- setting out a clear anti-bribery policy and keeping it up to date;
- making all employees aware of their responsibilities to adhere strictly to this policy at all times;
- training all employees so that they can recognise and avoid the use of bribery by themselves and others;
- encouraging its employees to be vigilant and to report any suspicions of bribery, providing them with suitable channels of communication and ensuring sensitive information is treated appropriately;
- rigorously investigating instances of alleged bribery and assisting police and other appropriate authorities in any resultant prosecution;
- taking firm and vigorous action against any individual(s) involved in bribery; and
- including appropriate clauses in contracts to prevent bribery.

Who is covered by the Policy?

This policy applies to all individuals working for Alexandra School at all levels (whether permanent, fixed-term or temporary), and includes governors, volunteers or any person associated with the school (collectively referred to as '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.

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Gifts and Hospitality

This policy does not prohibit normal and appropriate hospitality (given and received) to or from third parties provided that:

- it is appropriate in the circumstances, e.g. small gifts received from parents at the end of term are acceptable (up to a financial value of £25 per child or a present from a group of parents which exceeds £25 but where each individual is likely to have contributed under £25);
- nominal gifts and hospitality in general up to a financial value of £25 are acceptable; and
- gifts should not be offered to, or accepted from, local authority or government officials or representatives without the prior approval of the Head.

In assessing whether any gift is acceptable, the intention behind the gift should always be considered.

Where gifts are offered that exceed these limits, these should be refused if this can be done without causing undue offence. The offering of the gift should still be reported on the gift register so that the school has a record of any individual in the habit of making improper gifts. Otherwise the gift should be accepted, reported and the Headteacher and Finance Manager should decide what should be done with the gift. This may be to share the gift amongst all the school staff, donate it as a raffle item for the school fair or donate it to a charity of the school's choice. This decision will be recorded on the gift register.

What is Not Acceptable?

It is not acceptable for 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 will be received, or to reward an advantage already received;
- give, promise to give, or offer, a payment, gift or hospitality to a local authority or 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 an advantage will be provided by the school or staff in return;
- threaten or retaliate against another worker who has refused to commit a bribery offence or who has raised concerns under this policy; or
- engage in any activity that might lead to a breach of this policy.

Donations

Alexandra School only makes charitable donations that are legal and ethical under local laws and practices. No donation may be offered or made in our school's name or on behalf of our school without the prior approval of the Finance Manager or the Head.

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Business interests

All teaching and office staff are required to declare any interests they have outside their employment which can cause actual or perceived conflicts between their individual interests and those of the school and can therefore affect their capacity to make effective decisions on behalf of the school.

Additionally, these staff must also declare the interests of any close relatives that could result in a conflict of interests. The main purpose of this declaration is to safeguard everyone from any suspicion of wrongdoing, real or perceived.

Teaching and office staff are required to complete a Declaration of Business Interest form (copy attached) when they first join the school and at least once every 12 months subsequently.

Staff Responsibilities

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 everyone. All staff are required to avoid any activity that might lead to, or suggest, a breach of this policy. Staff must notify the Finance Manager or the Head 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 employee who breaches this policy will face disciplinary action, which could result in dismissal for gross misconduct.

Record-keeping

Records of business interests and the gift register will be kept in the Finance Manager's office. It is the staff member's responsibility to ensure that any gifts actually or likely to have a value of over £25 are recorded in the register.

An example copy of the record sheet is attached.

How to Raise a Concern

Staff are encouraged to raise concerns about any issue or suspicion of malpractice at the earliest possible stage. Concerns should be reported by following the procedure set out in our Whistleblowing Policy.

Staff who refuse to accept or offer a bribe, or those who raise concerns or report wrongdoing can understandably be worried about the possible repercussions. The Governing Body aims to encourage openness and will support anyone who raises a genuine concern in good faith under this policy, even if they turn out to be mistaken. We are committed to ensuring nobody suffers detrimental treatment through refusing to take part in bribery or corruption, or because of reporting a concern in good faith. If a staff member believes that he/she has suffered any such treatment, he/she should use the School's Grievance Procedure.

Training and Communication

All staff will be made aware of this policy and their obligations within.

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ALEXANDRA SCHOOL

Declaration of Business Interest

All teaching and office staff are required to declare any interests they have outside their employment with the school which can cause actual or perceived conflicts between their individual interests and those of the school and can therefore affect their capacity to make effective decisions on behalf of the school. Additionally, these staff must also declare the interests of any close relatives that could result in a conflict of interests. The main purpose of this declaration is to safeguard everyone from any suspicion of wrongdoing, real or perceived.

Business interests must be declared at the start of an individual's employment and subsequently at least once every 12 months.

Gifts

Employees must not accept gifts from anyone with whom they have a professional relationship on behalf of the Council, other than token items of nominal value such as a calendar or a diary. All gifts, above a value of £25, should be recorded in the log, kept in the bursar's office. It is the staff member's duty to record such gifts.

Declaration

- I declare that I do not have any interests outside my employment that could result in an actual or perceived conflict of interest

or

- I declare the following interests outside my employment that could result in an actual or perceived conflict of interest:

Interest(s) declared:

Name (Print).....

Signature Date:.....

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ALEXANDRA SCHOOL

Register of gifts received

Date	Name of recipient	Name of donor	Gift description	Value (approx. if not known)	Signature (recipient)	Decision concerning gift	Signature (HT)	Signature (Finance Manager)