



ANTI-BRIBERY, FRAUD AND CORRUPTION POLICY SUMMARY

Under The Bribery Act 2010 it is a criminal offence for individuals to:

- offer, promise or give of a bribe (active bribery);
- request, agree to receive or accept a bribe (passive bribery);
- bribe a foreign official.

Bryanston School has a commitment to carry out its business fairly, honestly and in good faith and therefore adopts a 'zero-tolerance' approach towards bribery. The School specifically prohibits the offering, giving, solicitation or acceptance of any advantage (whether in cash or otherwise) to or from any person or company.

The Bryanston School Anti-bribery, Fraud and Corruption Policy applies to all individuals working for the School at all levels (whether permanent, fixed-term or temporary), and includes Governors, volunteers, agents or any other person associated with us (collectively referred to as staff in this statement).

Any breach of the Bryanston School Anti-bribery, Fraud and Corruption Policy by staff will constitute gross misconduct and lead to disciplinary action (in addition to any criminal sanctions that may result).

In the context of this policy staff will commit an offence if they accept/offer any benefit as an inducement or reward that leads them in an official capacity to:

- take any action, or not to take action; or
- show favour, or disfavour, to anyone.

Under the Fraud Act 2006, a criminal offence for individuals to:

- dishonestly make a false representation (that is untrue or misleading) intending to make gain for themselves or another, or
- to cause loss to another or to expose another to a risk of loss.
- dishonestly fails to disclose to another person information which they are under a duty to disclose, for personal gain or to cause loss to another.

The full policy is available in the staff handbook and on the staff intranet. Staff have a responsibility to familiarise themselves with the full policy, but a summary is provided below of key procedures in relation to:

- purchasing and contracts; and
- gifts and hospitality.

Purchasing and Contracts

Expenditure is controlled by the application of delegated authority limits such that expenditure over certain levels requires additional authority. Staff must not purchase goods or services for their private use through any Bryanston School account; purchases must be made in a private capacity and invoiced and paid accordingly. In addition, staff must not use



their Bryanston link to gain favourable terms (over those which they can otherwise negotiate) from any school supplier/potential supplier.

Gifts and Hospitality

Staff may accept gifts or hospitality in the course of carrying out their duties, but they must be aware that gifts/hospitality (given or received) might place them in a vulnerable position and understand that the more lavish the gift, hospitality or favour the greater the inference that it is intended to influence.

In the interests of openness and integrity, the Chief Operating Officer will maintain a central register of gifts and hospitality (whether accepted or declined). The purpose of the register is to protect individual staff from accusations of impropriety. Low value gifts or hospitality do not need to be registered, but caution should be exercised and, if in doubt, included in the register. Low value is defined in the full policy.

High value gifts or hospitality must be approved by the Chief Operating Officer in advance of being accepted or declined. Gifts more than four times the value of the limit of low value are likely to be considered the property of the School. Staff being offered such gifts and those who are unsure should contact the Chief Operating Officer.

If you believe that a person has failed to comply with the Bribery Act, you should refer to the School's Whistleblowing Procedure.

Related policies:

Anti-bribery, Fraud and Corruption Policy
Code of Conduct for Bryanston School Staff
Whistleblowing Procedure
Governors' Conflicts of Interest Policy
Expenses Guidelines
Anti-Money Laundering Policy

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