



## **ANTI BRIBERY & HOSPITALITY POLICY**

**Ratified by Full Governing Body: 16 January 2019**

**Due for Review: January 2022**

## **Introduction**

St Peter's Catholic School, Bournemouth ("the School") is committed to the highest standards of ethical conduct and integrity in its activities. This policy outlines the School's position on preventing and prohibiting bribery, in accordance with the Bribery Act 2010. The School will not tolerate any form of bribery by, or of, its employees, agents or consultants or any person or body acting on its behalf. Senior management and Governors are committed to implementing effective measures to prevent, monitor and eliminate bribery.

## **Scope of this policy**

This policy applies to all governors, employees and officers of the School, and to temporary workers, consultants, contractors, agents and subsidiaries acting for, or on behalf of, the School ("associated persons"). Every employee and associated person acting for, or on behalf of, the School is responsible for maintaining the highest standards of business conduct. Any breach of this policy is likely to constitute a serious disciplinary, contractual and criminal matter for the individual concerned and may cause serious damage to the reputation and standing of the School.

All governors, employees and associated persons are required to familiarise themselves with this policy and comply with it fully.

## **What is prohibited?**

The School prohibits employees or associated persons from offering, promising, giving, soliciting or accepting any bribe. The bribe might be cash, a gift or other inducement to, or from, any person or organisation, whether a public or government official, official of a state-controlled industry, political party or a private person or company, regardless of whether the employee or associated person is situated in the UK or overseas. The bribe might be made to ensure that a person or the School improperly performs duties or functions (for example, by not acting impartially or in good faith or in accordance with their position of trust) to gain any commercial, contractual or regulatory advantage for the organisation in either obtaining or maintaining School business, or to gain any personal advantage, financial or otherwise, for the individual or anyone connected with the individual.

This prohibition also applies to indirect contributions, payments or gifts made in any manner as an inducement or reward for improper performance, for example through consultants, contractors or sub-contractors, agents or sub-agents, advisors, customers, suppliers or other third parties.

## **Reporting suspected bribery**

### **Principle**

The School depends on its employees and associated persons to ensure that the highest standards of ethical conduct are maintained in all its business dealings. Governors, employees and associated persons are requested to assist the School and to remain vigilant in preventing, detecting and reporting bribery.

Governors, employees and associated persons are encouraged to report any concerns that they may have to the Headteacher or delegated person as soon as possible. Issues that should be reported include:

- any suspected or actual attempts at bribery;
- concerns that other employees or associated persons may be being bribed; or
- concerns that other employees or associated persons may be bribing third parties, such as clients or government officials.

### **Procedure**

Please refer to the Whistleblowing Policy – to which all staff are required to comply.

### **Action by the School**

The School will fully investigate any instances of alleged or suspected bribery. Employees suspected of bribery may be suspended from their duties while the investigation is being carried out. The School will invoke its disciplinary procedures where any employee is suspected of bribery, and proven allegations may result in a finding of gross misconduct and immediate dismissal.

The School will provide all necessary assistance to the relevant authorities in any subsequent prosecution.

## **Records**

Employees and, where applicable, associated persons, are required to take particular care to ensure that all School records are accurately maintained in relation to any contracts or business activities, including invoices and all payment transactions with clients, suppliers and public officials.

Due diligence should be undertaken by governors, employees and associated persons prior to entering into any contract, arrangement or relationship with a potential supplier of services, agent, consultant or representative.

## **Corporate entertainment, gifts, hospitality and promotional expenditure.**

### **Principle**

The School permits corporate entertainment, gifts, hospitality and promotional expenditure that is undertaken:

- to improve the image and reputation of the School; or
- to present the School's services effectively;

and provided that it is:

- arranged in good faith, and
- not offered, promised or accepted to secure an advantage for the School or any of its employees or associated persons or to influence the impartiality of the recipient.

The School will authorise only reasonable, appropriate and proportionate entertainment and promotional expenditure.

### **Responsibilities**

Employees and, where relevant, associated persons:

- Must not give or accept gifts or hospitality to or from a third party where it might be perceived that their personal integrity has the potential to be compromised, or that the School might be placed under any obligation as a result of acceptance;
- Must not use their official position to further their private interests or the interests of others;
- Must not solicit gifts or hospitality;
- Must, within 7 days, report any gifts or hospitality offered to them or the School with an estimated value of over £25 to the School Business Manager or Finance Manager (see "Gifts or Hospitality received" section below); and
- Must follow the procedure set out in this policy before incurring any hospitality or promotional expenditure (see "Hospitality and Promotional Expenditure" section below)

### **Hospitality and Promotional Expenditure**

Employees and, where relevant, associated persons should submit requests for proposed hospitality and promotional expenditure well in advance of proposed dates to the Headteacher as Accounting Officer.

Employees are required to set out in writing:

- the objective of the proposed entertainment or expenditure;
- the identity of those who will be attending (in the case of entertainment or hospitality);
- the organisation that the recipient(s) of the entertainment or expenditure represent; and

- details and rationale of the proposed activity

The School will approve business entertainment proposals only if they demonstrate a clear business objective and are appropriate for the nature of the business relationship. The School will not approve business entertainment where it considers that a conflict of interest may arise or where it could be perceived that undue influence or a particular business benefit was being sought (for example, prior to a tendering exercise).

Employees and, where applicable, associated persons must supply records and receipts, in accordance with the School's expenses policy.

### **Gifts or Hospitality Received**

Any gifts, rewards or entertainment received or offered from clients, public officials, suppliers or other business contacts over the estimated value of £25 should be reported within 7 days to the School Business Manager or Finance Manager. In certain circumstances, it may not be appropriate to retain such gifts or be provided with the entertainment and employees and associated persons may be asked to return the gifts to the sender or refuse the entertainment, for example, where there could be a real or perceived conflict of interest. As a general rule, small tokens of appreciation, such as flowers, chocolates, biscuits or a small gift from pupils, may be retained by employees. The record of the notification will be retained electronically.

### **What practices are permitted?**

This policy does not prohibit:

- normal and appropriate hospitality and entertainment with and
- the use of any recognised fast-track process that is publicly available on payment of a fee.

Any such practices must be proportionate, reasonable and made in good faith. Clear records must be kept.

### **Charitable and political donations**

The School considers that charitable giving can form part of its wider commitment and responsibility to the community. The School may support a number of charities that are selected in accordance with objective criteria. The School may also support fundraising events involving employees.

### **Review of procedures**

The Full Governing Body will monitor and review the implementation of this policy and related procedures on a regular basis, including reviews of internal financial systems, corporate hospitality, gifts and entertainment policies.