



Anti-bribery and Corruption Policy

DJCF / EW

Last updated September 2023

Date	Person Conducting the Review	Changes Made
6/7/21	DJCF	Paragraph titled 'Record Keeping' updated to reflect that all staff must now make an entry, at appropriate times as indicated by the school, even if confirming a nil return. New link for the 'Register of Gifts and Hospitality'
9/9/22	DJCF	Annual update
1/9/23	DJCF	Annual update EW replacement of CCB Replacement of CMAS with HRF as responsible governor

The Bribery Act (Adequate Procedures) Guidance. Published on 30 March 2011 under Section 9 of the Bribery Act 2010.

The Bribery Act Prosecution Guidance. Published on 30 March 2011 by the Serious Fraud Office.

The Whistleblowing Policy under the Public Interest Disclosure Act 1998.

Responsible Governor – Miss Hannah Fox

It is Summer Fields' policy to conduct all 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. Summer Fields complies with the Bribery Act 2010 in respect of its conduct both at home and abroad.

The purpose of this policy is to:

- a) set out the responsibilities of Summer Fields, 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.

Bribery and corruption are punishable for individuals by up to ten years' imprisonment and if we are found to have taken part in corruption Summer Fields could face an unlimited fine and damage to our reputation. We therefore take our legal responsibilities very seriously.

In this policy, 'third party' means any individual or organisation that workers come into contact with during the course of their work, and includes actual and prospective pupils and parents, suppliers, business contacts, agents, advisors, and government and public bodies.

Who is covered by the policy?

This 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 Summer Fields (collectively referred to as 'workers' 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.

Gifts and Hospitality

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

The giving or receipt of gifts or hospitality is not prohibited, if the following requirements are met:

- it is not made with the intention of influencing a third party to obtain or retain business or a business advantage, or to reward the provision or retention of business or a business advantage, or in explicit exchange for favours or benefits;
- it complies with local laws;
- it does not include cash;
- it is appropriate in the circumstances. For example, it is customary for small gifts to be given at Christmas time;
- taking into account the reason for the gift, it is of an appropriate type and value and given at an appropriate time;
- it is given openly, not secretly; and
- gifts should not be offered to, or accepted from government officials or representatives without the prior approval of the Finance Director or the Headmaster.

We appreciate that the practice of giving business gifts varies between countries and regions and what may be normal and acceptable in one region may not be in another. The test to be applied is whether in all the circumstances the gift or hospitality is reasonable and justifiable. The intention of the gift should always be considered.

What is not Acceptable?

It is not acceptable for workers (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 for the school will be received, or to reward an advantage already received;
- give, promise to give, or offer, a payment, gift or hospitality to a 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 a business advantage will be provided by the school 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 breach of this policy.

Donations

Summer Fields only makes charitable donations that are legal and ethical under laws and practices. No donation must be offered or made in the school's name or on behalf of the school without the prior approval of the Finance Director or the Headmaster.

Workers' Responsibilities

Workers 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 all those working for us or under our control. All workers are required to avoid any activity that might lead to, or suggest, a breach of this policy.

A worker must notify the Finance Director or the Headmaster as soon as possible if s/he believes or suspects that a breach of this policy has occurred, or may occur in the future.

Any employee who breaches this policy may face disciplinary action, which could result in dismissal for gross misconduct. We reserve our right to terminate our contractual relationship with other workers if they breach this policy.

This policy should be read in conjunction with the school's Fundraising Policy and associated Code of Practice for Fundraising at Summer Fields.

Record-keeping

Summer Fields keeps financial records and has appropriate internal controls in place which will evidence the business reason for making payments to third parties.

All employees must disclose any hospitality or gift accepted with a value in excess of £100 in the 'Register of Gifts and Hospitality'. All employees who have not received such a gift must still make a nil return, at appropriate times as indicated by the school, to confirm that fact.

The Register of Gifts and Hospitality is accessed here:

[Register of Gifts / Hospitality](#)

This register will be maintained by the school and is available for review at any time by the Finance Director, the Headmaster or the responsible Governor.

If you have any doubt about accepting a gift, you should always consult either the Finance Director or Headmaster.

Workers must ensure all expense claims relating to hospitality, gifts or expenses incurred to third parties are submitted in accordance with the school's expenses policy and specifically record the reason for the expenditure.

All accounts, invoices, memoranda and other documents and records relating to dealings with third parties, such as clients, 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.

The school issues separate advice to all workers as to their responsibilities in respect of any potential tax liability under the **Income Tax (Earnings and Pensions) Act 2003, Section 324**.

How to Raise a Concern

Workers 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.

Protection

Workers who refuse to accept or offer a bribe, or those who raise concerns or report another's wrongdoing, are sometimes worried about possible repercussions. Summer Fields aims to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken.

Summer Fields is 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 a worker believes that s/he has suffered any such treatment, s/he should use the School's Grievance Procedure.

Training and Communication

Training on this policy will form part of the induction process for all new workers. All existing workers should receive relevant training on how to implement and adhere to this policy.