



**RADLEY**

# **Anti-Bribery and Corruption Policy**

**February 2024**

# Anti-bribery and corruption policy

## Introduction

It is Radley College's policy to conduct 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. Radley College complies with the Bribery Act 2010 in respect of its conduct both at home and abroad.

The purpose of this policy is to:

- set out the responsibilities of Radley College, and of those working for us, in observing and upholding our position on bribery and corruption; and
- 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 Radley College 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, advisers, 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 members of Council, volunteers or any other person associated with Radley College (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 or implicit exchange for favours or benefits;
- it complies with local law;
- it does not include cash or a cash equivalent (such as gift certificates or vouchers);
- 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 Bursar or the Warden.

The intention behind 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;
- engage in any activity that might lead to a breach of this policy; or
- solicit gifts from third parties, e.g. parents, on behalf of another member of staff.

### **Donations**

Radley College 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 Bursar or the Warden.

### **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 Bursar or the Warden 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.

### **Record-keeping**

Radley College 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 make their line manager/Head of Department aware and keep a written record of all hospitality or gifts accepted or offered, over a value of £100. An email stating item given, value, date and who authorised acceptance should be sent to the Warden's PA who

will enter the gift into the College's Gift Register (see below). This document is reviewed and signed off by the Bursar each term. If you have any doubt about accepting a gift, you should always consult your line manager.

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.

### **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. Radley College 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.

Radley College 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, he/she should use the School's Grievance Procedure.

**Gift register**

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This gift register is to be kept with a copy of the College's Anti-Bribery Policy and should be signed off at the end of each term by the Bursar.

<b>Staff Name</b>	<b>Item</b>	<b>Value</b>	<b>Date received</b>	<b>Authorised by</b>	<b>Signed off</b>