



EPSOM

COLLEGE

Anti-Corruption and Bribery Policy

1. INTRODUCTION

It is Epsom College's (the "School") policy to conduct all of its business in an honest and ethical manner. It takes a zero-tolerance approach to bribery and corruption and is committed to acting professionally, fairly and with integrity in all its business dealings and relationships wherever it operates, and implementing and enforcing effective systems to counter bribery. The School will comply with the Bribery Act 2010 (the Act), in respect of its conduct both at home and abroad.

The purpose of this policy is to:

- (a) set out the School's responsibilities, and of those working for it, in observing and upholding its position on bribery and corruption; and
- (b) provide information and guidance to those working for it 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 the School is found to have taken part in corruption it could face an unlimited fine and face damage to its reputation. It therefore takes its legal responsibilities very seriously.

In this policy, third party means any individual or organisation that a member of staff comes into contact with during the course of their work for the school, and includes actual and prospective pupils and parents, suppliers, business contacts, agents, advisers, and government and public bodies.

2. 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 the School (collectively referred to as staff in this policy).

3. WHAT IS BRIBERY?

A bribe is an inducement or reward offered, promised or provided in order to gain any business or personal advantage. An "advantage" includes money, gifts, loans, fees, hospitality, services, discounts, the award of a contract or anything else of value.

The following are examples of circumstances in which offences under the Act may occur:

- An IT Company providing services to the School offers you a free iPad as an incentive for renewing its contract for services.
- A Ski Company tendering for a contract with the School to facilitate a School trip offers to accommodate the children of a member of staff on the trip free of charge.

- To request or offer a reduction in school fees at another school in return for an expectation that the member of staff would induce other families to accept places at the other school.

Accepting any of the above offers may amount to an offence under the Act.

4. 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 is given in the School's name, not in the name of a member of staff;
- it does not include cash or a cash equivalent (such as gift certificates or vouchers);
- it is appropriate in the circumstances. For example, in the UK 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 Head.

From time-to-time parents or pupils may offer gifts to a member of staff on an individual basis as a demonstration of their gratitude for the work they have done on their behalf, and this is perfectly legitimate. However, in some contexts such gifts could be construed as an improper inducement to, for instance, accord preferential treatment in the future.

Consequently, it is necessary for the School to ask all those in receipt of a gift or hospitality whose value exceeds £75 to declare it to the School using the form include in Appendix A.

5. WHAT IS NOT ACCEPTABLE?

It is not acceptable for a member of 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 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 member of staff 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.

6. DONATIONS

The School only makes charitable donations that are legal and ethical under local 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 Head.

7. YOUR RESPONSIBILITIES

All members of 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 all those working for the School or under its control. All members of staff are required to avoid any activity that might lead to, or suggest, a breach of this policy.

The School could be held liable for failing to prevent bribery if a person associated with it commits an offence under the Act. All staff must notify the Bursar or the Head as soon as possible if they believe or suspect that a breach of this policy has occurred, or may occur in the future, or if they consider that you have been offered any inducement or reward with a view to obtaining a business or personal advantage.

Employees are made aware of this policy upon their appointment, along with the requirement to comply throughout their employment with the College. Any employee who breaches this policy will face disciplinary action, which may result in dismissal for gross misconduct. The School reserves its right to terminate the contractual relationship with other workers if they breach this policy.

8. RECORD-KEEPING

The School 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 the 'Director of Human Resources and Assistant Bursar' aware and keep a written record of all hospitality or gifts accepted or offered over £75 in value, which will be reviewed annually by the Bursar/Head and Governing Body.

All members of staff must ensure all expenses 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.

9. HOW TO RAISE A CONCERN

Members of 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 the School's Whistleblowing Policy.

10. PROTECTION

Members of staff who refuse to accept or offer a bribe, or those who raise concerns or report another's wrongdoing, are sometimes worried about possible repercussions. The School 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.

The School 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 member of staff believes that they have suffered any such treatment, they should use the School's Grievance Procedure.



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Appendix A: Record of Gift/Hospitality received by a member of staff

You should complete this form if you have received a gift/hospitality in connection with your duties and responsibilities at Epsom College which is of significant value (over £75)

The completed form should be returned to Denise Regan, Director of HR and Assistant Bursar. The details will be recorded on a schedule and will be reviewed annually by the Bursar/Head and Governing Body.

Employees should refer to the College's Anti-corruption and Bribery Policy for further details.

Name:		Position:	
Gift/Hospitality Received <i>(Provide brief details)</i>			
Value/Anticipated Value			
Reason for the gift/hospitality			
Signed:		Dated:	

For Office Use Only: Recorded on annual schedule/deemed appropriate.

Signed: <i>(Bursar)</i>		Dated:	
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