



LEICESTER GRAMMAR SCHOOL TRUST

ANTI-CORRUPTION AND BRIBERY POLICY

INTRODUCTION

It is the Trust's policy to conduct all of 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 business dealings and relationships wherever we operate, implementing and enforcing effective systems to counter bribery. The Trust will comply with the Bribery Act 2010, in respect of our conduct both at home and abroad.

The purpose of this policy is to:

- set out the Trust's responsibilities, 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 the Trust could face an unlimited fine, be excluded from tendering for public contracts and face damage to our reputation. We therefore take our legal responsibilities very seriously.

In this policy, third party means any individual or organisation you come into contact with during the course of your work for us, 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 Trust at all levels (whether permanent, fixed-term or temporary), and includes Trustees, volunteers, agents or any other person associated with us (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.

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 i-Pad as an incentive for renewing its contract for services.
- A travel company tendering for a contract with the School to facilitate a school trip offers to accommodate your children 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 offers identified above may amount to an offence under the Act.

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, 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 Trust's Headmaster & Chief Executive ("the Headmaster").

From time to time parents or pupils may offer you gifts on an individual basis as a demonstration of their gratitude for the work you 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.

Even when the guidelines appear to have been met, it is necessary for the Trust to have rules applying to gifts. These are as follows.

Gifts from parents of children currently attending one of the Trust's schools (Leicester Grammar School, Leicester Grammar Junior School or Stoneygate School):

- Gifts from parents, including vouchers, may be accepted but must be disclosed to the Business Director and added to the Gifts and Hospitality Register (held by the Business Director) if the value exceeds £50 from one individual or £100 from a group of individuals (eg the parents of pupils in a particular class who have 'clubbed together' to buy an end of term gift for a teacher).
- Gifts from a parent which exceed £150 in value over the course of a 12 month period must be disclosed to the Business Director regardless of the value of individual items.
- An offer of cash should not be accepted and the offer should be reported to the Business Director.
- If an individual has any concerns about accepting a particular gift the gift should be turned down and the Business Director should be informed.
- All offers of gifts which meet these criteria must be disclosed to the Business Director and included in the Gifts and Hospitality Register, even if the offer is not accepted.
- Disclosure (in writing or via e-mail) must be made to the Business Director within 14 days of being offered the gift.
- The Business Director will maintain the Gifts and Hospitality Register and make the Headmaster aware of all additions to it.
- At the absolute discretion of the Headmaster, an individual may be told not to accept a gift, or to return a gift to the donor.

Gifts from suppliers and others:

- You may retain gifts received from suppliers if they are token work-related items e.g. pens, notepads, flash drives, desk calendars or diaries with a nominal value. Such items do not need to be disclosed to the Business Director.
- Any gift from a supplier which exceeds £50 in value must be disclosed to the Business Director and added to the Gifts and Hospitality Register.
- A series of small gifts from the same supplier must be disclosed if they exceed £100 in value over the course of a 12 month period.
- A series of small gifts from different suppliers must be disclosed if they exceed £200 in value over the course of a 12 month period.
- Hospitality from a supplier which exceeds £50 in value must be disclosed to the Business Director and added to the Gifts and Hospitality Register.
- An offer of cash should not be accepted and the offer should be reported to the Business Director.
- If an individual has any concerns about accepting a particular gift, the gift should be turned down and the Business Director should be informed.
- All offers of gifts which meet these criteria must be disclosed to the Business Director and included in the Gifts and Hospitality Register, even if the offer is not accepted.
- Disclosure (in writing or via e-mail) must be made to the Business Director within 14 days of being offered the gift.
- The Business Director will maintain the Gifts and Hospitality Register and make the Headmaster aware of all additions to it.

- At the absolute discretion of the Headmaster, an individual may be told not to accept a gift, or to return a gift to the donor.

WHAT IS NOT ACCEPTABLE?

It is not acceptable for you (or someone on your behalf) to:

- give, promise to give, or offer, a payment, gift or hospitality with the expectation or hope that an advantage for the Trust 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 you 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 you know or suspect that it is offered or provided with an expectation that a business advantage will be provided by the Trust 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 a breach of this policy.

DONATIONS

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

YOUR RESPONSIBILITIES

You must ensure that you 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.

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

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

The Trust 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 Business Director aware of gifts and hospitality offered to them in line with the parameters set out above.

You must ensure all expense claims relating to hospitality, gifts or expenses incurred to third parties are submitted in accordance with the Trust'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

You 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 Trust's Whistleblowing Policy.

PROTECTION

Employees 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 Trust 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 Trust 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 you believe that you have suffered any such treatment, you should use the Trust's Grievance Procedure.

TRAINING AND COMMUNICATION

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

This is a whole Trust Policy and as such applies to all of the Trust's activities including Leicester Grammar School, Leicester Grammar Junior School and Stoneygate School, and includes EYFS.

OTHER RELATED POLICY DOCUMENTS

Whistleblowing Policy

Employee Handbook (issued to staff only)