**Anti bribery Policy and Procedure**

**Statement of Intent**

The purpose of this policy is to establish controls to ensure compliance with all applicable anti-bribery and corruption regulations, and to ensure that the Company’s business is conducted in a socially responsible manner, which protects our staff and families.

We are committed to acting professionally, fairly and with integrity in all our business dealings and relationships wherever we operate and implementing and enforcing effective systems to counter bribery.

Bribery is an inducement or reward offered, promised or provided to gain personal, commercial, regulatory or contractual advantage. Bribery is a criminal offence.

The Bribery Act 2010 identifies four categories of offence as follows:

* Offering, promising or giving a bribe.
* Requesting, agreeing to receive or accepting a bribe.
* Bribing a foreign public official to obtain or retain business.
* Failing to prevent bribery.

The potential consequences of being convicted of a Bribery Act offence include criminal penalties for both individuals (up to ten years in prison or an unlimited fine) and the Setting (unlimited fine).

**Procedures**

This means that staff and the management committee agree that they will not offer, promise, give, request, agree to receive, or accept any bribes:

* in the course of your employment;
* in the course of your Committee membership post;
* when conducting business on behalf of the setting; or
* when representing the organisation in any capacity.

A bribe means a financial payment or other form of reward or advantage, whether direct or indirect, that is intended to induce or influence, or has the effect of inducing or influencing, an individual, company or public body to perform their functions, including business and public duties, improperly. Improper performance includes:

* not acting in good faith;
* not acting impartially; and
* not acting in accordance with a position of trust.

**Gifts**

This Policy does not prohibit employees and committee members from accepting normal and appropriate gifts, such as those given by parents as a thank you for providing support and care of their children. In addition, it does not refer to any incentive schemes that support the settings professional development plans.

A gift above the value of £100 arising from or connected with your employment must not be accepted without first notifying the Supervisor/ Committee and specifying the nature of the gift and the circumstance in which it is being offered. If, in the reasonable opinion of the management acceptance of the gift is inappropriate you must decline it.

**Your responsibilities**

The prevention, detection and reporting of bribery and other forms of corruption are the responsibility of all those working for us or representing the setting. All employees are required to avoid any activity that might lead to, or suggest, a breach of this policy.

You must notify your Supervisor **OR** the Committee Chair as soon as possible if you believe or suspect that a conflict with or breach of this policy has occurred, or may occur in the future.

Any employee who breaches this policy will 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.

**What to do if you are a victim of bribery or corruption**

It is important that you tell the supervisor or a Committee member as soon as possible. If you are offered a bribe by a third party, are asked to make one, suspect that this may happen in the future, or believe that you are a victim of another form of unlawful activity you should inform the Supervisor or a Committee member in writing.

**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. We aim 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.

We are 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.

**Links to other Policies:**

* Safeguarding Policy and Procedure.
* Admissions and Attendance Policy and Procedure
* Confidentiality Policy and Procedure
* Staffing and Recruitment Policy and Procedure
* Whistle blowing Policy and Procedure

This policy also relates to an employee’s contract of employment.

***Policy adopted:*** October 2015,Reviewed - August 2016, Aug 2017, Aug 2019, Aug 2021

Reviewed Sept 2022, Sept 2023