



ANTI - BRIBERY AND CORRUPTION POLICY

Introduction

New legislation to reform the criminal law of bribery received Royal Assent on 8 April 2010. The Bribery Act 2011 came into force on 1 July 2011.

The SCHOLARS SCHOOL SYSTEM TRAINING accepts its fiduciary duty as a charity concern to ensure that the College does not tolerate bribery and corruption.

Taking bribes constitutes gross misconduct and this will be included in all Staff Contracts (Academic and Support) in the future.

The policy relates to the following:

- The staffs has a duty to notify the authorities where they discover instances of bribery, fraud or other malpractice
- Directors, teachers and staff sign a declaration of their outside interests on joining and annually thereafter
- Every contract for services is re-tendered at 5 year intervals unless there are well documented reasons why this should not be the case. The IQA tasks the Finance Committee with oversight of the school's procedures to prevent bribery and with reporting to it on a regular basis, or when requested.
- The College's Admissions policy is publicly available and on the web site. It specifies that places are offered on merit and on availability of places in specific course. Instructions issued state the requirement to conform to the school's anti-corruption policy and procedures.

The College has clear and unequivocal policies for handling of money. Accounts department is handling all the invoices. Topics covered are:

- Handling Cash
- Purchasing
- Ordering
- Invoicing and fee collection



- Staff pay and remuneration
- Banking
- Petty cash
- Cheque signing/BACS payments
- Appointing and paying contractors
- Hospitality Register
- Fund-raising
- Managing investments

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 your name;
- 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
- If you receive a gift from a group of parents then the maximum value that can be accepted will be based on an average of £25 per learner.
- You may retain gifts received from suppliers if they are token work related items e.g. pens, notepads, flash drives, desk calendars or diaries.



Any other gifts should be politely refused or donated to the School or School's nominated charity

- You may retain any other gifts of a value of up to £25. 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 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 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 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 a breach of this policy. SCHOLARS SCHOOL SYSTEM Training 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 directors.

Staff responsibilities:

All 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 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 School 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 IQA or Centre Head 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 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. SCHOLARS SCHOOL SYSTEM Training accounts department keeps financial records and has appropriate internal controls in place which will



evidence the business reason for making payments to third parties. You must ensure all expenses claims relating to hospitality, gifts or expenses incurred to third parties are submitted in accordance with the SCHOLARS SCHOOL SYSTEM TRAINING's 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.

Protection

Staffs that refuse to accept or offer a bribe, or those who raise concerns or report another's wrongdoing, are sometimes worried about possible repercussions. The SCHOLARS SCHOOL SYSTEM TRAINING 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. SCHOLARS SCHOOL SYSTEM TRAINING 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 School's Grievance Procedure. All existing workers will receive regular, relevant training on how to implement and adhere to this policy.

REVIEWED BY: IQA

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