

# ANTI-CORRUPTION AND BRIBERY POLICY

## SOUTH YORKSHIRE SCHOOL BUSINESS LEADERS C.I.C

### 1 ABOUT THIS POLICY

- 1.1 We, South Yorkshire School Business Leaders C.I.C (“**SYSBL**”), are a C.I.C, a community interest company. Our work involves consulting with various national and local policy makers and public-sector bodies (including the Department for Education, the Education Skills and Funding Agency and local authorities) and, in light of this, we have implemented this Anti-Corruption and Bribery Policy to ensure that we are following best practice.
- 1.2 It is our policy to conduct all of our business in an honest and ethical manner. We take a zero-tolerance approach to bribery and corruption and are committed to acting with integrity, transparency and accountability in all our business dealings and relationships wherever we operate and to implementing and enforcing effective systems to counter bribery and corruption.
- 1.3 We will uphold all laws relevant to countering bribery and corruption and remain bound by UK laws, including the Bribery Act 2010, in respect of our conduct.
- 1.4 The board of directors has overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it, for monitoring its use and effectiveness and dealing with queries about it.
- 1.5 This policy will be reviewed annually.

### 2 WHO MUST COMPLY WITH THIS POLICY?

- 2.1 This policy applies to all persons working for us or on our behalf in any capacity, including directors, volunteers, interns, agents, contractors, external consultants, third-party representatives, business partners, sponsors, or any other person associated with us, wherever located.
- 2.2 Any employee who breaches this policy will face disciplinary action, which could result in dismissal for gross misconduct. Any non-employee who breaches this policy may have their contract terminated with immediate effect.

### 3 WHAT IS BRIBERY?

- 3.1 **Bribery** is offering, promising, giving or accepting any financial or other advantage, to induce the recipient or any other person to act improperly in the performance of their functions, or to reward them for acting improperly, or where the recipient would act improperly by accepting the advantage.
- 3.2 An **advantage** includes money, gifts, loans, fees, hospitality, services, discounts, the award of a contract or anything else of value.
- 3.3 A person acts **improperly** where they act illegally, unethically, or contrary to an expectation of good faith or impartiality, or where they abuse a position of trust. The improper acts may be in relation to any business or professional activities, public functions, or other activities by or on behalf of any organisation of any kind.
- 3.4 **Corruption** is the abuse of entrusted power or position for private gain.
- 3.5 All forms of bribery are strictly prohibited. If you are unsure about whether a particular act constitutes bribery, raise it with one of the directors.
- 3.6 Specifically, you must not:

**Commented [RE1]:** We note that you do not currently have any employees or agents who carry out activities on behalf of SYSBL. However, we have included a thorough list to future-proof the policy if the position changes in the future.

- 3.6.1 give or offer any payment, gift, hospitality or other benefit in the expectation that a business advantage will be received in return, or to reward any business received;
  - 3.6.2 accept any offer from a third party that you know or suspect is made with the expectation that we will provide a business advantage for them or anyone else; or
  - 3.6.3 give or offer any payment (sometimes called a facilitation payment) to a government official in any country to facilitate or speed up a routine or necessary procedure;
- 3.7 You must not threaten or retaliate against another person who has refused to offer or accept a bribe or who has raised concerns about possible bribery or corruption.

#### **4 GIFTS AND HOSPITALITY**

- 4.1 This policy does not prohibit the giving or accepting of reasonable and appropriate hospitality for legitimate purposes such as building relationships, maintaining our image or reputation, or marketing our products and services.
- 4.2 A gift or hospitality will not be appropriate if it is unduly lavish or extravagant, or could be seen as an inducement or reward for any preferential treatment (for example, during contractual negotiations or a tender process).
- 4.3 Gifts must be of an appropriate type and value depending on the circumstances and taking account of the reason for the gift. Gifts must not include cash or cash equivalent (such as vouchers), or be given in secret. Gifts must be given in our name, not your name.
- 4.4 Promotional gifts of low value such as branded stationery may be given to or accepted from existing customers, suppliers and business partners.
- 4.5 Reimbursing a third party's expenses, or accepting an offer to reimburse our expenses (for example, the costs of attending a business meeting) would not usually amount to bribery. However, a payment in excess of genuine and reasonable business expenses (such as the cost of an extended hotel stay) is not acceptable.

#### **5 RECORD-KEEPING**

- 5.1 You must declare and keep a written record of all hospitality or gifts given or received which will be subject to review by one of the directors. You must also submit all expenses claims relating to hospitality, gifts or payments to third parties in accordance with our [expenses policy](#) and record the reason for expenditure.
- 5.2 All accounts, invoices, and other records relating to dealings with third parties including suppliers and customers should be prepared with strict accuracy and completeness. Accounts must NEVER be kept "off-book" to facilitate or conceal improper payments.

#### **6 HOW TO RAISE A CONCERN**

- 6.1 If you are offered a bribe, or are asked to make one, or if you suspect that any bribery, corruption or other breach of this policy has occurred or may occur, you must notify one of the directors as soon as possible.
- 6.2 Individuals who refuse to accept or offer a bribe, or 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.

**Date of last review of policy: 19<sup>th</sup> April 2023**

**Commented [RE2]:** Do you have an expenses policy? We do not need to draft one for you – it can be a simple document setting out the procedures to follow and thresholds.