



St Matthews Pre-School Group

Anti-Bribery Notice

NOT 001

This document outlines the measures which St Matthews Pre-School takes to prevent bribery and the procedures we follow if bribery occurs.

Date	Task	Name	Position
April 2020	Notice Created	Tracy-Anne Clancy	Pre-School Manager
August 2023	Notice Reviewed	Louise Moye	Pre-School Manager
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Introduction

This document:

- outlines the measures which St Matthews Pre-School takes to prevent bribery and the procedures we follow if bribery occurs.
- is designed to assist staff and persons associated with the pre-school to understand the risks associated with bribery and to encourage them to be vigilant and effectively recognise, prevent and report any wrongdoing, whether by themselves or others.
- aims to provide suitable and secure reporting and communication channels and to ensure that any information that is reported is properly and effectively dealt with.
- aims to create and maintain a rigorous and effective framework for dealing with any suspected instances of bribery or corruption.

1.0 DEFINITIONS

1.1 *Bribery and corruption*

It is illegal to give or receive a bribe under the Bribery Act 2010 and organisations are liable for bribes taken or given on their behalf where they do not have adequate procedures in place.

Bribery is the offering, promising, giving, accepting or soliciting of money, a gift or other advantage as an inducement to do something that is illegal or a breach of trust in the course of carrying out an organisation's activities.

Corruption is the misuse of public office or power for private gain; or misuse of private power in relation to business outside the realm of government.

1.2 What is a bribe?

Bribes can take on many different shapes and forms, but typically they involve corrupt intent.

There will usually be a 'quid pro quo' – both parties will benefit. A bribe could be the:

- Direct or indirect promise, offering, or authorisation, of anything of value
- Offer or receipt of any inducement, loan, fee, reward or other advantage
- Giving of aid, donations or voting designed to exert improper influence



Examples of bribery may include:

- A relative of a potential new starter offering money or a gift in order to influence the offering of a pre-school place
- a job applicant offering payment in order to increase his/her chance of being offered employment

1.3 Gifts and hospitality

These can range from small gifts (such as flowers, vouchers, food and drink) to expensive hospitality (invitations to hosted meals, receptions and tickets for major events, holidays etc.). Expenditure which is proportionate and reasonable is unlikely to qualify as a bribe. However, extravagant gifts and hospitality may be used to disguise bribes that are intended to induce improper behaviour (e.g. to fix the allocation of sessions).

Genuine hospitality or similar business expenditure that is reasonable and proportionate is not prohibited by the Act.

2.0 RESPONSIBILITIES

All Staff & Volunteers (including Committee and Trustees) are expected to behave in an ethical, professional and lawful manner at all times. Individuals are responsible for not giving or receiving bribes and challenging instances where bribery may occur. They are also responsible for reporting all bribery that they are aware of via the procedures laid out in this policy.

3.0 REPORTING INSTANCES OF BRIBERY

All staff & volunteers should reject demands for or offers of bribes. Any such approaches should be reported immediately to the manager. Details of any bribery or requested or attempted bribery, should be documented as soon as possible after the event. Any instances of actual or potential bribery should be properly and promptly investigated by the Pre-School Manager / Committee.

The objectives of an investigation should be to:

- Confirm whether or not a bribe has taken place, and to identify who was responsible.
- Confirm whether internal controls and anti-bribery procedures have worked in practice.
- Identify any improvements required to anti-bribery procedures.



Depending on the findings of the investigation, subsequent action will be determined. This may involve disciplinary action against staff involved or external reporting to:

- A senior official or director of another organisation, if the person making the bribe is from that organisation
- Local police/ law enforcement agencies (if deemed appropriate)
- Serious Fraud Office (in the UK, the SFO has primary responsibility for the UK Bribery Act)
- Relevant government department where the bribe took place
- The Charity Commission, if the matter is considered a “serious incident”

References:

<https://www.gov.uk/government/publications/bribery-act-2010-guidance>