



Diocese of Bristol Academies Trust

Anti-Bribery Policy

Date Adopted:

16th April 2015

History of most recent Policy changes (must be completed)

Date	Page	Change	Origin of Change e.g. TU request, Change in legislation

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Anti-Bribery Policy

Purpose

The purpose of this policy is to:

- (a) provide a coherent and consistent approach to ensuring compliance with the Bribery Act 2010;
- (b) set out our responsibilities, and of those working for us, in observing and upholding our position on bribery and corruption; and
- (c) provide information and guidance to those working for us on how to recognise and deal with bribery and corruption issues.

The policy applies to all the activities of DBAT and our Academies, including our work with actual and potential suppliers, business contacts, advisers and government and public bodies.

It applies to all persons working for us or on our behalf in any capacity, including employees, directors, officers, agency workers, seconded workers, volunteers, contractors, external consultants, third-party representatives and business partners, sponsors or any other person associated with us.

Definition of Bribery

Bribery is an inducement or reward offered, promised or provided to gain personal, commercial, regulatory or contractual advantage. An 'inducement or reward' includes money, gifts, loans, fees, hospitality, services, discounts, award of a contract or anything else of value. Corruption is the abuse of entrusted power or position for private gain.

It is a criminal offence to offer, promise, give, request, or accept a bribe. Individuals found guilty can be punished by up to ten years' imprisonment and/or a fine. As an employer, if we fail to prevent bribery we can face an unlimited fine, exclusion from tendering for public contracts and damage to our reputation. We take our legal responsibilities very seriously.

Policy Statement

It is our policy to conduct our work as an organisation transparently, honestly and ethically. We take a zero-tolerance approach to bribery and corruption and are committed to acting fairly and with integrity in all of our dealings and relationships and implementing and enforcing effective systems to counter bribery and corruption.

DBAT is committed to countering bribery and corruption in all forms and will not tolerate it in any of its activities. We, and our Academies, do not and will not pay bribes or offer improper inducement to anyone for any purpose. Equally, DBAT and our Academies do not and will not accept any bribes or improper inducements.

DBAT also requires that all staff and all those working or performing any service on or on behalf of DBAT neither accept nor give bribes.

Activities which are prohibited

It is not acceptable for employees of DBAT, or any person or organisation working or performing any service for or on behalf of DBAT, to:

- (a) give, promise to give, or offer, a payment, gift or hospitality with the expectation or hope that a favourable advantage will be received, or to reward a favourable advantage already given;
- (b) give or accept a gift or hospitality during any commercial negotiations or tender process, if this could be perceived as intended or likely to influence the outcome;
- (c) accept a payment, gift or hospitality from a third party that you know or suspect is offered with the expectation that it will provide a favourable advantage for them or anyone else in return;
- (d) give, promise to give, or offer payment, gifts or hospitality to a government official, agent or representative to facilitate or expedite a routine procedure
- (e) accept hospitality from a third party that is unduly lavish or extravagant under the circumstances;
- (f) offer or accept a gift to or from government officials or representatives, or politicians or political parties;
- (g) threaten or retaliate against another individual who has refused to commit a bribery offence or who has raised concerns under this policy; or
- (h) engage in any other activity that might lead to a breach of this policy

Gifts and hospitality

This policy allows reasonable and appropriate hospitality or entertainment given to or received from third parties, for the purposes of:

- (a) establishing or maintaining good business relationships;
- (b) improving or maintaining our image or reputation; or
- (c) marketing or presenting our services effectively.

The giving and accepting of gifts is allowed if the following requirements are met:

- (a) it is not made with the intention of influencing a third party to obtain or retain business or a favourable advantage, or to reward the provision or retention of business or a favourable advantage, or in explicit or implicit exchange for favours or benefits;
- (b) it is given in our name, not in your name;

- (c) it does not include cash or a cash equivalent (such as gift certificates or vouchers);
- (d) it is appropriate in the circumstances, taking account of the reason for the gift, its timing and value; and
- (e) it is given openly and not secretly.

Promotional gifts of low value, such as branded stationery to or from suppliers, will usually be acceptable.

All gifts, payments or any other contribution made, whether in cash or in kind, shall be documented and properly accounted for. A register of all gifts, payments etc will be held by each academy business/ office manager.

How to raise a concern

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.

Such persons are required to avoid any activity that might lead to, or suggest, a breach of this policy. If the person is offered a bribe, or they are asked to make one or they have a belief or suspicion that a conflict with this policy has occurred or may occur in the future, they must notify the chair of the Local Board or report it in accordance with our Whistleblowing Policy as soon as possible.

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. If you believe that you have suffered any such treatment, you should inform the Chair of the local board. If the matter is not remedied, and you are an employee, you should raise it formally using our Grievance Procedure.

Any unfounded or malicious allegations will be subject to a full investigation and appropriate disciplinary action.

Breaches of this policy

Any employee who breaches this policy faces the possibility of civil and criminal prosecution. They also face disciplinary action, which could result in dismissal for gross misconduct.

We may terminate our relationship with other individuals and organisations working on our behalf if they breach this policy.

Training and communication

The Main Board of DBAT is ultimately accountable for ensuring that all directors and employees of DBAT are aware of this policy and have been provided with appropriate training on the types of bribery, the risks of engaging in bribery activity and how employees should report suspicion of bribery.

Local Boards have delegated responsibility from the Main Board for ensuring that staff employed at their Academy have been made aware of this policy and have received appropriate training.

Related Policies

This policy must be considered alongside the following policies which collectively set out DBAT's approach to reducing bribery risks:

- (a) Whistleblowing
- (b) Code of Conduct for staff
- (c) Code of Conduct for Directors and Local Board Members
- (d) Grievance and Disciplinary Procedures