



UNIVERSITY OF CAMBRIDGE PRIMARY SCHOOL

Anti-Bribery Policy

JANUARY 2017



UCPS Anti-Bribery Policy			
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Governing Committee Responsible	Finance Resources and Buildings		
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Contents

1. Introduction
2. Bribery Act 2010
3. Public Service Values
4. Anti-Bribery
5. Facilitation Payments
6. Breach of Policy
7. External Communication

1. The Introduction

- a. The purpose of this document is to ensure that the Trust/School operates with accountability, openness, honesty and integrity.
- b. The guidance provides direction for employees, governors and trustees in dealing with bribery or suspected bribery.
- c. This document should be read in conjunction with the Gifts and Hospitality Policy and Whistleblowing Policy.

2. Bribery Act 2010

- a. The Bribery Act 2010 introduces a new, clearer regime for tackling bribery that will apply to all businesses based or operating in the UK. It covers all sorts of bribery, the offering and receiving of a bribe, directly or indirectly, whether or not it involves a public official, in the UK or abroad.
- b. There are offences by individuals and a corporate offence for corporates and partnerships, and penalties for non-compliance are serious.
- c. Bribery is a criminal offence for both individuals and commercial organisations and can be punished with imprisonment of up to 10 years or unlimited fines.

3. Public Service Values

- a. The three fundamental public service values are:
 - i. **Accountability.** Everything done by those who work for Trust/School must be able to stand the tests of parliamentary scrutiny, public judgements on property and professional codes of conduct.
 - ii. **Probity.** Absolute honesty and integrity should be exercised in dealing with assets, employees, suppliers and customers.
 - iii. **Openness.** The Trust's/School's actions should be sufficiently public and transparent to promote confidence between the Trust/School, its employees and the public.
- b. In addition, all those who work for or are in contract with the Trust or its schools should exercise the following when undertaking their duties.
 - i. **Selflessness.** Should take decisions solely in terms of the public interest. They should not do so in order to gain financial or other material benefits for themselves, their family or their friends.
 - ii. **Integrity.** Should not place themselves under any financial or other obligation to outside individuals or organisations that might influence them in the performance of their official duties.
 - iii. **Objectivity.** Should, in carrying out public business, (including making public appointments, awarding contracts, or recommending individuals for rewards and benefits), make choices on merit.
 - iv. **Accountability.** Should be accountable for their decisions and actions to the public and must submit themselves to whatever scrutiny is appropriate to their office.

- v. **Openness.** Should be as open as possible about all the decisions and actions that they take. They should give reasons for their decisions and restrict information only when the wider public interest demands.
- vi. **Honesty.** Have a duty to declare any private interests relating to their public duties and to take steps to resolve any conflicts arising in a way that protects the public interest.
- vii. **Leadership.** Should promote and support these principles by leadership and example.

4. Anti-Bribery

- a. Off-the-book accounts and misleading entries on financial forms and documents or in the accounting records are strictly prohibited; where there is any concern as to how a transaction should be described, the full facts should be discussed with the Chair of the Finance, Resources & Buildings Committee.
- b. All gifts, payments or any other contribution made under the Anti-Bribery Policy and these guidelines, whether in cash or in kind, shall be documented, regularly reviewed, and properly accounted for on the books of the school.
- c. The Trust/School's employees will not request or receive a bribe from anybody, nor imply that such an act might be considered. This means that you will not agree to receive or accept a financial or other advantage from a former, current or future client, business partner, contractor or supplier or any other person as an incentive or reward to perform improperly your function or activities.
- d. Bribing anybody is absolutely prohibited. Employees will not pay a bribe to anybody. This means that you will not offer, promise, reward in any way or give a financial or other advantage to any person in order to induce that person to perform his/her function or activities improperly. It does not matter whether the other person is a UK or foreign public official, political candidate, party official, private individual, private or public sector employee or any other person (including creating the appearance of an effort to improperly influence another person).
- e. The Trust/School may, in certain circumstances, be held responsible for acts of bribery committed by intermediaries acting on its behalf such as subsidiaries, clients, business partners, contractors, suppliers, agents, advisors, consultants or other third parties. The use of intermediaries for the purpose of committing acts of bribery is prohibited.
- f. All intermediaries shall be selected with care, and all agreements with intermediaries shall be concluded under terms that are in line with this policy.
- g. All employees should be aware that bribery will normally, dependent upon the circumstances of the case, be regarded as gross misconduct thus warranting summary dismissal without previous warnings. A proper investigation and a disciplinary hearing may be conducted

5. Facilitation Payments

- a. Facilitation payments are small payments made to secure or expedite the performance of a routine action by a government official or agency (e.g. issuing licences or permits, installation of a telephone line, processing goods through customs, etc.) to which the payer (or the company) has legal or other entitlement.
- b. Facilitation payments are prohibited under the Bribery Act like any other form of bribe.

6. Breach of Policy

- a. The Trust wishes to encourage anyone having reasonable suspicions of bribery to report them as per the whistleblowing policy. The University Training School Trust “whistleblowing” policy (Guidelines on reporting misconduct to the authorities), which will be rigorously enforced, is that no individual will suffer any detrimental treatment as a result of reporting reasonably held suspicions.
- b. Any unfounded or malicious allegations will be subject to a full investigation and appropriate disciplinary action.

7. External Communication

- a. Individuals (be they governors, trustees, employees, agency staff, locums, contractors or suppliers) must not communicate with any member of the press, media or another third party about a suspected act of bribery as this may seriously damage the investigation and any subsequent actions to be taken.