

G4 Anti-Corruption and Bribery Policy

Introduction

It is The Purcell School's policy to conduct all of its business in an honest and ethical manner. We take a zero-tolerance approach to bribery and corruption and are committed to acting professionally, fairly and with integrity in all our business dealings and relationships wherever we operate; we are committed to implementing and enforcing effective systems to counter bribery. The Purcell School will comply with the Bribery Act 2010 in respect of its conduct both in the United Kingdom and abroad.

The purpose of this policy is to:

- a) set out the responsibilities of The Purcell School, and of all employees, in observing and upholding our position on bribery and corruption and:
- b) provide information and guidance to all employees on how to recognise and deal with bribery and corruption issues.

Bribery and corruption are punishable for individuals by up to ten years' imprisonment; if we are found to have taken part in corruption The Purcell School could face an unlimited fine and damage to its reputation. We therefore take our legal responsibilities very seriously.

In this policy, 'third party' means any individual or organisation that employees come into contact with during the course of their work for The Purcell School, and includes actual and prospective students and parents, suppliers, business contacts, agents, advisers, and government and public bodies.

Who is Covered by the Policy?

This policy applies to all individuals working for The Purcell School at all levels (whether permanent, fixed-term or temporary), and includes governors, volunteers, agents or any other person associated with The Purcell School (referred to as 'employees' or 'you' in this policy).

What is Bribery?

A bribe is an inducement or reward offered, promised or provided in order to gain any business or personal advantage.

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 Purcell 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
- gifts should not be offered to, or accepted from, government officials or representatives without the prior approval of the Principal or Bursar.

We appreciate that the practice of giving business gifts varies between countries and regions and what may be normal and acceptable in one region may not be in another. The test to be applied is whether in all the circumstances the gift of hospitality is reasonable and justifiable. The intention behind the gift should always be considered.

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 Purcell 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 they 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 they know or suspect that it is offered or provided with an expectation that a business advantage will be provided by The Purcell School in return;
- threaten or retaliate against another employee 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.

Donations

The Purcell School only makes charitable donations that are legal and ethical under local laws and practices. No donation must be offered or made in The Purcell School's name or on behalf of The Purcell School without the prior approval of the Board, Principal or Bursar.

Employees' Responsibilities

You must ensure that you 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 employees are required to avoid any activity that might lead to, or suggest, a breach of this policy.

An employee must notify the Principal or Bursar as soon as possible if he / she believes or suspects 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 employees if they breach this policy.

Record-keeping

The Purcell School keeps financial records and has appropriate internal controls in place which will evidence the business reason for making payments to third parties.

All employees must make their line manager aware and keep a written record of all hospitality or gifts accepted or offered, which will be subject to managerial review.

Employees must ensure all expenses claims relating to hospitality, gifts or expenses incurred to third parties are submitted in accordance with The Purcell School's expenses 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

Employees are encouraged to raise concerns about any issue or suspicion of malpractice at the earliest possible stage. Concerns should be reported by following the procedures set out in our Whistleblowing policy.

Protection

Employees who refuse to accept or offer a bribe are sometimes worried about possible repercussions. The School 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.

The School is committed to ensuring that 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.

<i>Policy author/reviewer:</i>	<i>Policy data/review date:</i>	<i>Next review date:</i>
Jo Wallis	December 2019	December 2020
Jo Wallis	December 2020	December 2021
Adam Wroblewski	September 2021	September 2022