



Cheadle Hulme School

## **ANTIBRIBERY POLICY**

**Please also refer to Equality & Diversity Policy**

Cheadle Hulme School is committed to ensuring that all those associated with it uphold the highest standards of integrity and adopts a zero tolerance attitude towards acts of bribery and corruption. Every transaction with individuals, companies or other organisations on behalf of the School will be conducted professionally and transparently and be compliant with any legislation governing bribery and corruption.

The School interprets bribery as the offer or acceptance of a reward to persuade another to act dishonestly and/or in breach of the law. It can include the offering, promising, giving, receiving or soliciting of a financial, academic or other advantage or favour as a means to influence the actions of an individual (or individuals).

Compliance with this policy is mandatory for all its Governors, employees and/or anyone else who negotiates, provides or performs a service for or on behalf of the School. They are explicitly prohibited from:

- bribing another person either acting on their own or on behalf of another organisation. A bribe includes the offering, promising or giving of any financial or other type of advantage when dealing or negotiating on behalf of Cheadle Hulme School;
- accepting a bribe. This includes soliciting, agreeing to receive or accepting any financial, or another kind of incentive; and
- condoning the offering or acceptance of bribes.

Anyone negotiating on behalf of the School will:

- act with integrity and propriety at all times;
- seek advice if unsure about what constitutes an act of bribery in respect of the School's activities, operations and dealings;
- report details immediately to the Chief Operating Officer/Head/Chair of Governors if they suspect bribery is taking or has taken place;
- co-operate fully with any internal checks, reviews or investigations relating to allegations of breaches of this policy.

Cheadle Hulme School will:

- ensure that all those covered by this policy are provided with information which would help them identify potential behaviours or transactions which could be an indication of bribery;
- be responsible for monitoring the operation and effectiveness of its anti-bribery arrangements and shall be informed about any bribery activity and investigations into such activity;
- ensure that robust financial controls are in place to reduce the likelihood of "hidden" financial transactions;
- investigate promptly and thoroughly all cases of actual or suspected bribery;
- co-operate with any investigations undertaken by police or other relevant authorities and if necessary inform such authorities of any internal investigations;
- take disciplinary action, not only against any employees found to have perpetrated bribery, but also against anyone whose negligence is held to have facilitated or condoned an act of bribery;

- seek to avoid doing business with others who do not accept our stated values and who may harm our reputation.

The School also has an Acceptance of Donations, Endowments and Legacies Policy which ensures the appropriateness of any gifts being offered to or accepted by the School.

Date of approval by Governors:	<input type="text" value="July 2016"/>
Date of approval by Head and Second Master	<input type="text" value="July 2016"/>
Proposed review date:	<input type="text" value="June 2017"/>
Governor Group responsible:	<input type="text" value="Finance"/>
SLT member responsible:	<input type="text" value="Chief Operating Officer"/>
Relevant Procedure:	<input type="text"/>