D'OVERBROECK'S
OXFORD
A NORD ANGLIA EDUCATION SCHOOL

ANTI-BRIBERY AND CORRUPTION POLICY

Last reviewed:	October 2026
Next review due:	October 2027
Reviewed by:	Head of Finance

1. Introduction

It is the school's policy to conduct all of our 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, and implementing and enforcing effective systems to counter bribery. The school will comply with the Bribery Act 2010 (the Act), in respect of our conduct both at home and abroad.

The purpose of this policy is to:

(a) set out the school's responsibilities, and of those working for us, in observing and upholding our position on bribery and corruption; and

(b) provide information and guidance to those working for us on how to recognise and deal with bribery and corruption issues.

Bribery and corruption are punishable for individuals by up to ten years' imprisonment and/or a fine. As an employer, if we fail to prevent bribery or are found to have taken part in corruption, the school could face an unlimited fine, be excluded from tendering for public contracts and face reputational damage. We therefore take our legal responsibilities very seriously.

In this policy, **'third party'** means any individual or organisation with whom staff come into contact during the course of their work for the school, and includes actual and prospective students and parents, suppliers, business contacts, agents, advisers, and government and public bodies, including their advisers, representatives and officials, politicians and political parties.

2. Who is covered by the policy?

This policy applies to all individuals working for d'Overbroeck's at all levels (whether permanent, fixed-term or temporary), and includes Governors, volunteers, peripatetic staff, invigilators, agents or any other person associated with us (collectively referred to as **'staff'** in this policy)

3. What are bribery and corruption?

A bribe is an inducement or reward offered, promised or provided in order to gain any business or personal advantage. An 'advantage' includes money, gifts, loans, fees, hospitality, services, discounts, the award of a contract or anything else of value.

Corruption is the abuse of an entrusted power or position for private gain.

The following are examples of circumstances in which offences under the Act may occur:

- An IT Company providing services to the school offers you a free I-Pad as an incentive for renewing its contract for services.
- A Ski Company tendering for a contract with the school to facilitate a school trip offers to accommodate your children on the trip free of charge.
- To request or offer a reduction in school fees at another school in return for an expectation that the member of staff would encourage other families to accept places at that school.

Accepting any of the above offers may amount to an offence under the Act.

4. Gifts and hospitality

Gifts include any token of appreciation and gratitude, gift vouchers, cash, physical gifts (eg, a bottle of wine) or other items of value (eg, sports tickets, vouchers).

Hospitality and entertainment can include any attendance at social events, conferences, functions, or other occasions, business lunches or drinks (whether they include a business purpose or not) and any travel or accommodation provided in connection with the hospitality and entertainment.

Giving or receiving appropriate gifts and hospitality is not prohibited, so long as 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 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 Head of Finance or the Principal.

4.1 What is acceptable

From time to time parents, students or external business contacts may offer gifts to staff members on an individual basis as a demonstration of their gratitude for the work they have done on their behalf, and this is perfectly legitimate. In line with Nord Anglia's anti-bribery policy, items with a value up to £40 (including tickets, gift cards and vouchers) may be received and offered without declaring them to the Head of Finance. The following guidance explains when an item should be declared but if staff are in doubt about an item, they should err on the side of caution and declare it.

Staff may accept without declaration:

- gifts received from suppliers if they are token work-related items, eg, pens, notepads, flash drives, desk calendars or diaries, or treats such as a box of chocolates. Supplier gifts that appear overly generous (staff should use their own judgement about this) should be politely refused or donated to the school or school's nominated charity. If the gift is donated to charity then the giver of the gift should be told that this is the case.
- a gift up to the value of £40, including vouchers, gift cards and tickets;
- hospitality and entertainment up to £40 per person entertained.

Staff may offer without declaration:

- marketing materials such as pens, bookmarks, etc, that are branded with the school logo;
- a gift up to the value of £40, including vouchers and tickets;
- hospitality and entertainment up to £40 per person entertained.

4.2 **Gifts that MUST BE DECLARED**

In some contexts gifts could be construed as an improper inducement, for instance, to gain preferential treatment in the future.

- Report to the Head of Finance by email If you receive:
    - cash of any value, or
    - any other gift worth over £40. It is acceptable for staff to keep a gift worth up to £140 but it must be declared. Gifts worth more than £140 should be either declined, or donated to the school or school's nominated charity. The giver should be thanked for their gift and informed of the decision.

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 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 you 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 you know or suspect that it is offered or provided with an expectation that a business advantage will be provided by the school in return;
- threaten or retaliate against another worker 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.

5. Facilitation payments

Facilitation payments are typically small unofficial payments paid to speed up an administrative process or secure a routine government action by an official, which are not necessarily considered bribery under local law or custom. They are more common in certain overseas jurisdictions and staff travelling internationally may encounter them, but it is also possible that they could arise in the UK.

These payments are bribes under UK and other local laws, and d'Overbroeck's adopts a zero tolerance approach to demands for facilitation payments. Any demands for payment should be reported immediately to the Head of Finance. Examples include:

- to obtain or expedite a permit, licence or other official document or approval;
- to facilitate mail pick-up and delivery;
- to facilitate provision of utilities to a site, such as connecting water, electricity, gas or telephone services;
- at border controls or crossings to allow safe or prompt entry or exit from a jurisdiction; or
- at customs.

Facilitation payments should be contrasted with official, lawful payments (typically to an organisation rather than an individual) to expedite certain functions (eg, where there is a choice of fast track services to obtain a passport).

In very exceptional circumstances, if you are at risk of violence or loss of liberty, or there is a threat to personal safety, it may be necessary to make the payment. Take a detailed note of what happened and report the incident to the Head of Finance or Principal as soon as practicable.

6. Donations

The school only makes charitable donations that are legal and ethical under local laws and practices. No donation may be offered or made in the school's name or on behalf of the school without the prior approval of the Head of Finance or the Principal.

7. Scholarships and bursaries

If scholarships or bursaries offered by the school, the selection and rationale will be documented to ensure transparency.

8. Staff responsibilities

Staff must 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 d'Overbroeck's or under the school's control. All staff are required to avoid any activity that might lead to, or suggest, a breach of this policy. Staff must therefore assess the vulnerability of their activities, particularly overseas, on an ongoing basis.

The school could be held liable for failing to prevent bribery if a person associated with it commits an offence under the Act. Staff must notify the Head of Finance or the Principal as soon as possible if they believe or suspect that a breach of this policy has occurred, or may occur in the future, or if they consider that they 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. The school reserves the right to terminate a contractual relationship with other workers if they breach this policy.

9. Record-keeping

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

All staff must make the Head of Finance aware of, and keep a written record of, all hospitality or gifts received or offered above the limits outlined in section 4 above. Declared gifts will be subject to managerial review. The Head of Finance will maintain a record of declared gifts and hospitality (see **Appendix**).

Staff must ensure all expenses claims relating to hospitality, gifts or expenses incurred to third parties are submitted in accordance with the 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.

10. How to raise a concern

The school expects staff to raise concerns at the earliest possible stage if they have suspicions about a breach of this policy, malpractice or unethical behaviour. Concerns or queries should be reported to the Head of Finance.

It is important that you tell the Head of Finance as soon as possible if you are offered a bribe by a third party, are asked to make one, suspect that this may happen in the future, or believe that you are a victim of another form of unlawful activity.

11. Staff protection

Workers who refuse to accept or offer a bribe, or those who raise concerns or report another's wrongdoing, are sometimes worried about possible repercussions. The school encourages openness and will support anyone who acts as a Whistle Blower, ie, who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken.

The school is 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. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If any member of staff believes they have suffered any such treatment, they should use the School's Grievance Procedure.

The school will protect the confidentiality and, where appropriate, the anonymity of the Whistle Blower to the fullest possible extent under the law and consistent with the need to conduct an adequate review. The school may be required to disclose details of the Whistle Blower if compelled to do so by a court or competent legal authority.

If it is established that the Whistle Blower has made a deliberately false or misleading report, then that itself is considered a serious matter and may render the person concerned subject to disciplinary proceedings.

12. Training and communication

Training on this policy forms part of the induction process for all new workers. All existing staff will receive regular, relevant training on how to implement and adhere to this policy.

13. Money laundering

Money laundering is the process by which the proceeds of illegally obtained money are processed or spent to create the appearance that they have come from a legal source.

Please see our Anti-Money Laundering policy.

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Associated policies

Available from the school website:

- Anti-money laundering policy
- Anti-fraud policy
- Whistle blowers protection policy (Nord Anglia Education policy)

Available to staff from the school SharePoint:

- Grievance & disciplinary policy

Available to staff from the NAE SharePoint:

- Anti-corruption & bribery policy (Nord Anglia Education policy)
- Anti-fraud policy

APPENDIX

The Head of Finance will maintain a register that records the following information about gifts, hospitality and entertainment received and offered by d'Overbroeck's staff.

RECEIVED:

Date declared	**Name of staff member receiving the gift**	**External party offering the gift**	**Description** *(what, why, when)*	**Accepted/ Declined**	**Estimated value (£)**	**Approved by & date**

OFFERED:

Date declared	**Name of staff member offering the gift**	**External party receiving the gift**	**Description** *(what, why, when)*	**Accepted/ Declined**	**Estimated value (£)**	**Approved by & date**

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