



## ANTI-BRIBERY

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### *Statement*

Stay At School is committed to fulfilling its responsibilities to protect the funds it administers against fraud and corruption. This policy is designed to:

- Promote standards of honest and fair conduct;
- Encourage prevention of fraud and corruption;
- Maintain strong systems of internal control;
- Promote detection;
- Pursue a zero-tolerance policy and bring to justice anyone who commits acts of fraud or corruption; and,
- Recover any losses incurred by Stay At School.

Stay At School will continually strive to ensure that all its financial, contractual and administrative processes are conducted and reported honestly, accurately, transparently and accountably and that all decisions are taken objectively and free from personal interest. Stay At School will not condone any behaviour that falls short of these principles. Stay At School Trustees, staff and volunteers have a responsibility for putting these principles into practice and for reporting any breaches they may discover.

### *Principles*

Stay At School is committed to a policy of zero-tolerance of bribery in any form and will implement policies to counter bribery, including:

#### **High-level commitment**

The Board of Trustees and senior management are committed to and overseeing the implementation of a policy of zero-tolerance, recognising that bribery is contrary to fundamental values of integrity, transparency and accountability and undermines organisational effectiveness.

#### **Risk assessment**

Bribery risk assessment is a central part of our overall and ongoing risk management process.

#### **Robust anti-bribery procedures**

We devise, implement and maintain robust procedures, which are proportionate to the risks and to the size, resources and complexity of our organisation.

#### **Due-diligence assessment of partners, agents and contractors**

We are committed to assessing the bribery risk associated with entering into partnership or contracting arrangements with other entities and carry out periodic due diligence based on that risk



assessment. Partnership or contractual arrangements are made on the basis that partner organisations have policies and procedures which are consistent with these Principles.

#### **Dissemination and communication**

We are committed to implementing effective internal and external communication of our policy and procedures related to anti-bribery. We are working to embed training and awareness programmes to ensure staff and partners are aware of the potential risks, how bribery might affect them, what they should do if they are offered a bribe, and the consequences should they be found to have made or received a bribe.

#### **Monitoring and evaluation**

Implementation of anti-bribery procedures are monitored as part of overall risk management and internal control processes. Periodic reviews of anti-bribery procedures will be made and reported as part of governance and accountability processes.

#### **Collective action**

We are committed to sharing information and strengthening collective action to prevent bribery.

#### *Responsibilities*

In relation to the prevention of fraud, theft, misuse of equipment and abuse of position, specific responsibilities are as follows:

#### **Trustees**

The Trustees are responsible for establishing and maintaining a sound system of internal control that supports the achievement of the organisation's policies, aims and objectives. The system of internal control is designed to respond to and manage the whole range of risks that the organisation faces. The system of internal control is based on an on-going process designed to identify the principal risks, to evaluate the nature and extent of those risks and to manage them effectively. Managing fraud risk is seen in the context of the management of this wider range of risks.

#### **Executive Director**

Overall responsibility for managing the risk of fraud has been delegated to the Executive Director and they will undertake a regular review of the bribery/fraud risks associated with each of the key organisational objectives. They will establish an effective anti-bribery/fraud response plan, in proportion to the level of risk identified and establish appropriate mechanisms for reporting risk issues and reporting significant incidents to the Board of Trustees. They are also responsible for ensuring that all staff and partners are aware of the organisation's Anti-Bribery Policy and their responsibilities.

#### **All staff and partners**

Every member of staff or partner is responsible for:



- Acting with propriety in the use of the organisation's resources and the handling and use of funds whether they are involved with cash, receipts, payments or dealing with suppliers;
- Conducting themselves in accordance with the seven principles set out above. They are: selflessness, integrity, objectivity, accountability, openness, honesty and leadership;
- Being alert to the possibility that unusual events or transactions could be indicators of bribery/fraud;
- Alerting their manager when they believe the opportunity for fraud exists e.g. because of poor procedures or lack of effective oversight;
- Reporting details immediately if they suspect that a bribe/fraud has been committed or see any suspicious acts or events; and,
- Cooperating fully with whoever is conducting internal checks, reviews or investigations.

#### *Detection/investigation*

An irregularity is any incident or action which is not part of the normal operation of the system or expected course of events which may be as a result of a bribe/fraud.

The Chair of the Board of Trustees must be notified immediately of all financial or accounting irregularities or suspected irregularities or of any circumstances which may suggest the possibility of irregularities including those affecting cash, stores, property, remuneration or allowances.

Reporting of suspected irregularities is essential as it facilitates a proper investigation by experienced staff and ensures the consistent treatment of information regarding fraud and corruption. When so notified, the Chair will instigate an investigation by appointing a designated officer, auditor or other adviser. The designated officer, auditor or other advisor will:

- Deal promptly with the matter;
- Record evidence received;
- Ensure the security and confidentiality of evidence;
- Work closely with senior managers of the Charity and other agencies, such as the Police and Courts to ensure that all issues are properly investigated and reported upon;
- Ensure maximum recoveries are made on behalf of the organisation.

No action will be taken against anyone who has reported a potential bribe/fraud should the suspicion turn out to be unfounded, provided that they have acted in good faith. Malicious accusations may be the subject of disciplinary action. The Public Interest Disclosure Act 1998 protects whistleblowers from victimisation, discipline or dismissal where they raise genuine concerns of misconduct or malpractice.

An individual should not deal with any allegation or suspicion of fraud themselves but should refer them to their line manager. Should the concern be about the line manager then it should be referred to the Executive Director. Should the concern be about the Executive Director it should be referred to the Chair. Should the concern be about the Chair it should be referred to the Executive Director or one of the Trustees.



**Review**

These policies and procedures will be reviewed periodically to ensure compliance with changes in law and equality and diversity legislation.

*Adopted:* March 2018

*To be reviewed:* March 2019