

# LYCÉE INTERNATIONAL DE LONDRES WINSTON CHURCHILL

(The "School")

## Policy #17: Gifts, Benefits, Inducements and Anti-Bribery

### **Mission**

Through a rigorous, bilingual programme and innovative methods, we educate pupils to become responsible, creative, and principled global citizens. We teach them to think critically and act ethically, to form and express their own opinions and respect those of others, to define their own life goals, and to make sense of and embrace change.

Our values are excellence, creativity, integrity, awareness and community.

In support of these aims and values we are committed to ensuring the following:

### **Introduction**

It is the 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 and implementing and enforcing effective systems to counter bribery. The School will comply with the Bribery Act 2010 in respect of its conduct both at home and abroad.

The purpose of this policy is to:

- set out the responsibilities of the School and of those working for us, in observing and upholding our position on bribery and corruption;
- 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 if we are found to have taken part in corruption the 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 workers come into contact with during the course of their work for the School and includes actual and prospective students, parents and carers, suppliers, business contacts, agents, advisers, and government and public bodies.

### **1. Who is covered by the Policy?**

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

### **2. What is Bribery?**

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

### **3. Gifts and Hospitality**

This policy does not prohibit normal and appropriate hospitality (given and received) to or from third parties.

The giving or receiving of gifts or hospitality with a value of less than £100 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 School's name, not in a worker's name;
- it does not include cash;
- it is appropriate in the circumstances. For example, in the UK it is customary for small gifts to be given from time to time;
- it takes 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.

For any other gifts, refer to the employee handbook.

Gifts should not be offered to, or accepted from, government officials or representatives without the prior approval of the COO or the Head.

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 or hospitality is reasonable and justifiable. The intention behind the gift should always be considered.

#### **4. What is not acceptable?**

It is not acceptable for workers (or someone on their 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 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 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. Donations**

The School only makes charitable donations that are legal and ethical under local laws and practices. No donation must be offered or made in the School's name or on behalf of the School without the prior approval of the COO or the Head, subject to the terms of the Finance Committee.

## **6. Workers' Responsibilities**

Workers must ensure that they 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 workers are required to avoid any activity that might lead to, or suggest, a breach of this policy.

A worker must notify the COO or the Head as soon as possible if he/she believes or suspects that a breach of this policy has occurred, or may occur in the future.

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 workers if they breach this policy.

## **7. 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 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.

Workers must ensure all expenses claims relating to hospitality, gifts or expenses in relation 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.

## **8. How to raise a concern**

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

## **9. 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 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 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 a worker believes that he/she has suffered any such treatment, he/she should use the School's Grievance Procedure.

## **10. Training and Communication**

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

Policy created in 2015.

Policy reviewed in:

- February 2023
- March 2018
- August 2016
- February 2016