

## **5. Anti-Bribery Policy**

### **Legislation**

The Bribery Act 2010 creates an offence which can be committed by an organisation which fails to prevent persons associated with them from committing bribery on its behalf, but only if that person performs services for you in business. It is unlikely that the organisation will be liable for the actions of someone who simply supplies goods to you. There is full defence if it can be shown that there are adequate procedures and risk assessments in place to prevent bribery.

At La Petite Academy we have adopted this policy to ensure that we have adequate procedures in place that are proportionate to the bribery risks we face. It is our 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 dealings wherever we operate. We are also committed to implementing and enforcing effective systems to counter bribery.

### **What is a bribe?**

A bribe is a financial or other advantage offered or given:

- To anyone to persuade them to, or reward them for, performing their duties improperly;
- To any public official with the intention of influencing the official in the performance of his/her duties.

### **Gifts and hospitality**

A 'gift' is defined as any item, cash, goods, or any service which is offered for personal benefit at a cost, or no cost, that is less than its commercial value. You should consider the following if a gift is offered:

- Whether it is appropriate to accept it;
- Decline gifts unless to do so would cause serious embarrassment;
- Discuss the position with the manager or owner if the gift clearly has a value in excess of £25.

Parents may wish to thank nursery staff for looking after their children with Christmas gifts or gifts when the child moves on from a particular room or leaves the nursery. This is perfectly understandable and accepted with good grace and thanks. Each staff member is responsible for deciding if this gift is appropriate to accept and if it should be shared with the wider team. If in any doubt staff

should discuss this with the nursery manager. For gifts containing alcohol, the Alcohol and Substance Misuse policy must be followed.

The nursery will not accept gifts from service providers over the value of £25. This may be deemed as a bribe to maintain a contract. The nursery will remain transparent and open at all times.

<b>This policy was adopted on</b>	<b>Signed on behalf of the nursery</b>	<b>Date for review</b>
<i>15/05/25</i>	<i>Seren Brown</i>	<i>30/04/2029</i>