



Anti-Bribery Policy

Purpose

This policy relates sets out the approach by the Inspire Education Group (IEG) to all forms of bribery and is intended to provide direction and help to employees who may identify, or suspect bribery. The overall aims of this policy are to:

- Improve the knowledge and understanding of everyone in IEG, irrespective of their position, about the risk of bribery within the organisation and its unacceptability
- Assist in promoting a climate of openness, and a culture and environment where staff feel able to raise concerns sensibly and responsibly
- Set out IEG's responsibilities in terms of the deterrence, prevention, detection and investigation of bribery and corruption
- Ensure the appropriate sanctions are considered following an investigation, which may include any or all of the following:
 - Criminal prosecution
 - Civil prosecution
 - Internal/external disciplinary action (including professional/regulatory bodies)

A relevant function or activity includes public, state or business activities or any activity performed in the course of a person's employment, where the person performing that activity is expected to perform it in good faith, impartially, or in accordance with a position of trust.

Scope

This policy applies to all employees of the Group and to temporary workers, consultants, contractors, agents and subsidiaries acting for, or on behalf of the Group (associated persons) within the UK and overseas. Every employee and associated person acting for, or on behalf of the Group is responsible for maintaining the highest standards of business conduct.

The Policy Statement

IEG is committed to the highest standards of ethical conduct and integrity in all its business activities. This policy outlines the Group's position on preventing and prohibiting bribery, in accordance with the Bribery Act 2010.

Bribery is a criminal offence for both individuals and commercial organisations and can be punished with imprisonment of up to 10 years or unlimited fines. Ministry of Justice guidance on Adequate Procedures (S7 para 35) makes it clear that IEG is within the scope of the legislation. This means that all employees must act lawfully and ensure

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IEG's reputation is not damaged.

Responsibilities

The Group Governors

The Group Governors has a duty to ensure that it provides a secure environment in which to work and one where people are confident to raise concerns. The Group Governors has a duty to ensure that those concerns are listened to and addressed.

The Group Governors and/or the Accounting Officer will be liable to be called to account for failing to prevent bribery. IEG therefore has a duty to ensure employees receive adequate training and support in order to carry out their responsibilities. Therefore, the Principal and Chief Executive and/or another nominated member of the senior management team will monitor and ensure compliance with this policy.

Line managers

Line managers at all levels have a responsibility to ensure that an adequate system of internal control exists within their areas of responsibility and that controls operate effectively. The responsibility for the prevention and detection of bribery therefore primarily rests with managers but requires the co-operation of all employees.

As part of that responsibility, line managers need to:

- Inform staff of IEG's gifts and hospitality, declaration of interest and counter fraud and anti-bribery policies as part of their induction process, paying particular attention to the need for accurate completion of personal records and forms, and are made aware of the requirements of the policy
- Ensure that adequate control measures are put in place to minimise the risks. This must include clear roles and responsibilities, supervisory checks, staff rotation (particularly in key posts), separation of duties wherever possible so that control of a key function is not invested in one individual, and regular reviews, reconciliations and test checks to ensure that control measures continue to operate effectively
- Identify sensitive/at-risk posts
- Ensure compliance with incumbent controls
- Contribute to their line manager's assessment of the risks and controls within their area, which feeds into IEG's overall statements of accountability and internal control.

All instances of actual or suspected bribery, which come to the attention of a manager, must be reported immediately. It is appreciated that some employees will initially raise concerns with their manager, however, in such cases managers must not attempt to investigate the allegation themselves, and they have the clear responsibility to refer the concerns in line with IEG's Whistleblowing Policy as soon as possible.

Employees

Staff at all levels will lead by example in acting with the utmost integrity and ensuring adherence to all relevant regulations, policies and procedures.

Employees must act in accordance with the IEG's Gifts and Hospitality and Declaration

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of Interest policies which include guidance on the receipt of gifts or hospitality.

Employees who are involved in receiving offers of sponsorship, funding or gifts from outside agencies also should comply with their own professional codes of practice where applicable.

Related Procedures and Documentation

Anti-Bribery Policy Appendix 1 – Procedures

Declaration of Interests

Financial Regulations/Standing Financial Instructions

Procurement Policy

Whistleblowing Policy

Disciplinary Policy

Risk Management Policy

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Anti-Bribery Policy – Appendix 1

Procedures

Inspire Education Group (IEG) prohibits any form of bribery or corrupt practices, whether covered directly by the Bribery Act 2010 or not. The policy applies to IEG, all its employees and anyone acting for, or on behalf of, the Group (“associated persons”), including, but not limited to governors, other volunteers, temporary workers, consultants and contractors. Irrespective of their grade and position this policy shall be respected at all times.

All employees have a personal responsibility to protect IEG from bribery or corruption, are responsible for maintaining the highest standards of business conduct and are expected to behave honestly and with integrity.

IEG is absolutely committed to maintaining an honest, open and constructive culture so as to best fulfil its objectives. It is, therefore, also committed to the elimination of bribery, to the rigorous investigation of any such allegations and to taking appropriate action against wrong doers, including possible criminal prosecution.

All gifts, payments or any other contribution, whether in cash or in kind, shall be documented, regularly reviewed and properly accounted.

IEG procures goods and services ethically and transparently with the quality, price and value for money determining the successful supplier/contractor, not by receiving (or offering) improper inducements, as outlined in the Groups Financial Regulations and Procurement Policy. IEG will not engage in any form of bribery, either in the UK or abroad.

IEG prohibits employees and associated persons from offering, giving, soliciting or accepting any bribe in any way, or to give, or be perceived to have given, a financial or other advantage to any person (whether a UK or foreign public official, political candidate, party official, private individual, private or public sector employee or any other person) in order to induce that person to perform his/her functions or activities improperly. The bribe might include cash, a gift or other inducement, to or from any person or organisation, wherever they are situated, and irrespective of whether or not they are a public official/body or private person or company, by an individual governor, employee, agent or other person or body acting on the Groups behalf. The bribe might be in order to:

- Gain any commercial, contractual or regulatory advantage for IEG in a way which is unethical
- Gain any personal advantage, pecuniary, or otherwise, for the individual or anyone connected with the individual

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IEG may, in certain circumstances, be held responsible for acts of bribery committed by intermediaries acting on its behalf such as subsidiaries, clients, business partners, contractors, suppliers, agents, advisors, consultants or other third parties. The use of intermediaries for the purpose of committing acts of bribery is prohibited.

All intermediaries shall be selected with care, and all agreements with intermediaries shall be concluded under terms that are in line with this policy. IEG will contractually require its agents and other intermediaries to comply with the Anti-Bribery Policy and to keep proper books and records available for inspection by IEG auditors or investigating authorities. Agreements with agents and other intermediaries shall at all times provide for the necessary contractual mechanisms to enforce compliance with the anti-bribery regime. IEG will monitor performance and, in case of non-compliance, require the correction of deficiencies, apply sanctions, or eventually terminate the agreement even if this may result in a loss of business.

All employees should be aware that bribery will normally be regarded as a serious disciplinary offence which will be addressed in accordance with IEG existing disciplinary policy and associated procedures.

Definitions

Definitions for bribery and corruption vary, but both are covered within The Bribery Act 2010. Some common definitions are:

Bribery - “Inducement for an action which is illegal, unethical or a breach of trust. Inducements can take the form of gifts, loans, fees, rewards or other advantages”. Appendix A is a summary of the Bribery Act 2010.

Corruption - This can be broadly defined as the offering or acceptance of inducements, gifts, favours, payment or benefit-in-kind which may influence the action of any person. Corruption does not always result in a loss. The corrupt person may not benefit directly from their deeds; however, they may be unreasonably using their position to give some advantage to another.

A bribe is a financial or other type of advantage that is offered or requested with the:

- Intention of inducing or rewarding improper performance of a function or activity
- Knowledge or belief that accepting such a reward would constitute the improper performance of such a function or activity

It is a common law offence of corruption to bribe the holder of a public office and it is similarly an offence for the office holder to accept a bribe.

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A criminal offence will be committed under the Bribery Act 2010 if:

- An employee or associated person acting for, or on behalf of, the Group offers, promises, gives, requests, receives or agrees to receive bribes
- An employee or associated person acting for, or on behalf of, the Group offers, promises or gives a bribe to another with the intention of influencing that official in the performance of his/her duties (where local law does not permit or require such influence)
- The Group does not have the defense that it has adequate procedures in place to prevent bribery by its employees or associated persons

Gifts and hospitality

This policy is not intended to prohibit appropriate corporate entertainment and/or hospitality undertaken in connection with IEG business activities, provided the activity is customary under the circumstances, is proportionate, and is properly recorded / disclosed to IEG in accordance with its procedures, provided that it is:

- Arranged in good faith
- Not offered, promised or accepted to secure an advantage for the Group or any of its employees or associated persons or to influence the impartiality of the recipient
- The Group will authorise only reasonable, appropriate and proportionate entertainment and promotional expenditure
- This principle applies to employees and associated persons. Those remits overseas will be given further training on the specific procedures that they are required to follow

Charitable and Political Donations

The Group considers that charitable giving can form part of its wider commitment and responsibility to the community. The Group supports a number of charities that are selected in accordance with objective criteria.

Any donations and contributions must be ethical and transparent. The recipient's identity and planned use of the donation must be clear, and the reason and purpose for the donation must be justifiable and documented. All charitable donations will be publicly disclosed.

Donations to individuals and for-profit organisations and donations paid to private accounts are incompatible with IEG ethical standards and are prohibited.

Any such practices must be proportionate, reasonable and made in good faith. Clear records must be kept.

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Sponsorship arrangements

Sponsoring means any contribution in money or in kind by IEG towards an event organised by a third party in return for the opportunity raise IEG profile. All sponsoring contributions must be transparent, pursuant to a written agreement, for legitimate business purposes, and proportionate to the consideration offered by the event host. They may not be made towards events organised by individuals or organisations that have goals incompatible with IEG ethical standards or that would damage IEG reputation. All sponsorships will be publicly disclosed.

Where commercial sponsorship is used to fund IEG training events, training materials and general meetings, the sponsorship must be transparent, pursuant to a written agreement, for legitimate business purposes, and proportionate to the occasion. Where meetings are sponsored by external sources, that fact must be disclosed in the papers relating to the meeting and in any published minutes/proceedings.

Where sponsorship links to the development of guidelines and advice, this should be carried out in consultation with IEG nominated member of the senior management team.

Procurement

Procurement practices will be conducted in a fair and transparent manner and not deal with contractors or suppliers known or reasonably suspected to be paying bribes. Before engaging contractors and suppliers, IEG will undertake properly documented due diligence. IEG will require material contractors and suppliers to comply with its Anti-Bribery Policy as a minimum standard. Agreements with contractors and suppliers shall, at all times, provide for the necessary contractual mechanisms to enforce compliance with the anti- bribery arrangements. IEG will monitor performance and, in case of non-compliance, require the correction of deficiencies, apply sanctions, or eventually terminate the agreement.

Facilitation payments

‘Facilitation payments’ are payments made to secure or expedite the performance of a routine action by a government official or agency to which the payer (or the company) has legal or other entitlement.

Facilitation payments are prohibited under the Bribery Act like any other form of bribe. They shall not be given by IEG or IEG employees in the UK or any other country.

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