



# Anti-Bribery & Corruption Policy

Reviewed	Date of Next Review	Responsibility
April 2025	April 2028	Head of Finance

## Our Mission:

**'To enable young people to live and work without barriers'**

## Our Values:

- **Teamwork** – we hold ourselves and each other to account and are better when we work together
- **Compassion** – we act with trust, honesty and kindness in everything we do
- **Inclusion** – we treat each other fairly and with respect
- **Innovation** – we encourage thoughtful, creative and aspirational ideas
- **Pride** – we encourage each other to be proud of who we are and what we do

Fairfield Trust (FT) commits to a policy of zero-tolerance of bribery in any form, recognising that bribery is contrary to fundamental values of integrity, transparency and accountability.

## **1. Introduction**

- 1.1 FT will uphold all laws relevant to countering bribery and corruption in accordance with the Bribery Act 2010 (the Act), which applies to conduct both in the UK and abroad.

## **2. Responsibility**

- 2.1 The Board of Trustees (the Board) and the Senior Leadership Team (SLT) commit to and will oversee the implementation of the Policy.

## **3. Scope and applicability**

- 3.1 This policy applies to all individuals working for or on behalf of FT at all levels and grades, whether permanent, fixed term or temporary, and wherever located, including trustees, consultants, contractors, seconded staff, casual staff, agency staff, volunteers, agents, sponsors and any other person who performs services for or on behalf of FT (referred to as Workers in this policy).

## **4. Due-diligence and procedures for third parties**

- 4.1 FT will carry out reasonable and proportionate due diligence on potential associates before entering into contracts with them and will put in place procedures for managing the associated risks on an on-going basis. In this policy, Third Party means any individual or organisation that Workers come into contact with during the course of their work and includes students, potential students (and family), intermediaries, referrers of work, suppliers, agents, advisers, government and public bodies (including their advisers, representatives and officials), politicians and political parties.
- 4.2 FT may also be liable under the Act if it fails to prevent bribery by an associated person (including, but not limited to Workers) for their benefit.

## **5. What is bribery?**

- 5.1 A bribe is an inducement or reward offered, promised or provided in order to improperly gain any commercial, contractual, regulatory or personal advantage, which may constitute an offence under the Act, namely:
- giving or offering a bribe
  - receiving or requesting a bribe

## **6. Gifts and hospitality**

6.1 This policy does not prohibit normal and appropriate gifts and hospitality (given and received) to or from Third Parties, subject to the principles set out below:

- must not be made with the intention of improperly influencing a Third Party or Worker 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
- must comply with local law
- must be given in the name of the organisation, not in an individual's name
- must not include cash or a cash equivalent
- must be appropriate in the circumstances
- must be of an appropriate type and value and given at an appropriate time taking into account the reason for the gift
- must be given openly

6.2 Workers are expected to notify the Head of Finance both to report the receipt or giving of a gift or to check if there is any doubt as to whether it can be regarded as normal and appropriate in terms of gifts and hospitality. The financial limit is set at **£100**.

6.3 It is not acceptable for any Worker (or someone on their behalf) to:

- give, promise to give, or offer, a payment, gift or hospitality with the expectation or hope that they or the FT will improperly be given a business advantage, or as a reward for a business advantage already improperly given;
- 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 where it is known or suspected that it is offered or given with the expectation that the Third Party will improperly obtain a business advantage;
- accept a gift or hospitality from a Third Party where it is known or suspected that it is offered or provided with an expectation that a business advantage will be improperly provided by the Firm 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.

## **7. Communication and training**

7.1 FT will build awareness and understanding of its anti-bribery policy among its Trustees, employees, volunteers and relevant stakeholders through communication and appropriate training. It reports publicly on its anti-bribery measures by publishing the Policy on the FT website.

## **8. Monitoring, evaluation and review**

8.1 FT will undertake a biennial bribery risk assessment to ensure compliance with its anti-bribery policy. It will monitor the implementation and effectiveness of its Policy. The results of monitoring will be reported regularly to the Trustees who will guide improvements to the Policy at review.

8.2 FT will keep appropriate records and have robust internal controls in place which evidence the reason for gifts or hospitality received.

A log will be updated by Finance for any gift/hospitality received/given in excess of the agreed financial value of **£100**. The spreadsheet will include the date of gift/hospitality, approximate or actual face value and the reason for it.

Approved by the Board of Trustees

**Kate Durrant**

**Head of Finance**

April 2025