

Anti-Bribery and Corruption Policy

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Purpose, Scope and Principles

AS2Educate is committed to conducting all aspects of its work with honesty, integrity, transparency and accountability. We have a zero-tolerance approach to bribery, corruption and any form of improper influence.

This Policy sets out the standards expected of everyone working for or on behalf of AS2Educate and supports compliance with the Bribery Act 2010 and other relevant legislation.

We are committed to ensuring that decisions relating to education, safeguarding, recruitment, procurement, commissioning, financial management and organisational governance are made fairly, objectively and solely in the best interests of the children and young people we support and the organisation.

This Policy applies to:

- all employees;
- Directors;
- agency staff;
- volunteers;
- contractors;
- consultants;
- suppliers acting on behalf of AS2Educate; and
- any individual representing AS2Educate in an official capacity.

Everyone working for or on behalf of AS2Educate is expected to uphold the highest standards of ethical conduct and must not offer, promise, give, request, agree to receive or accept any form of bribe or improper inducement.

Definitions

For the purposes of this Policy:

Bribery means offering, promising, giving, requesting or accepting a financial or other advantage with the intention of influencing a person to perform their duties improperly or rewarding improper conduct.

Corruption means the abuse of a position of trust, authority or responsibility for personal, financial or other improper gain.

Examples include:

- offering money or gifts to influence decisions;
- accepting personal benefits in return for awarding contracts or services;
- manipulating procurement, recruitment or commissioning decisions;
- influencing examination, assessment or placement decisions for personal benefit; or
- using a position within AS2Educate to obtain an unfair advantage.

Responsibilities

Everyone working for or on behalf of AS2Educate is responsible for:

- complying with this Policy;
- acting honestly, fairly and with integrity;
- refusing any offer that could constitute bribery or corruption;
- declaring conflicts of interest in accordance with the Conflicts of Interest and Declaration of Interests Policy;
- reporting concerns promptly; and
- cooperating with any investigation.

The Provision Manager and Senior Leadership Team are responsible for promoting a culture of openness, ethical decision-making and accountability throughout the organisation.

Prohibited Conduct

No person acting on behalf of AS2Educate may:

- offer, promise or give a bribe;
 - request, agree to receive or accept a bribe;
 - misuse their position for personal gain;
 - improperly influence any decision relating to education, safeguarding, recruitment, procurement or finance;
 - make or authorise facilitation payments;
 - conceal suspected bribery or corruption; or
 - retaliate against anyone who raises a genuine concern.
- AS2Educate does not make political donations.

Any charitable donations made on behalf of AS2Educate must be appropriately authorised and must never be used to influence business decisions or secure an improper advantage.

Gifts, Hospitality and Personal Benefits

AS2Educate recognises that modest expressions of appreciation may occasionally be offered by children, families or professional partners.

Staff must not offer, request or accept gifts, hospitality or personal benefits that could reasonably be perceived as influencing professional judgement or creating a conflict of interest.

Modest tokens of appreciation of nominal value may be accepted where appropriate and where they do not compromise professional integrity.

Any gift, hospitality or personal benefit that could reasonably be perceived as influencing professional judgement must be declared to the Provision Manager and recorded within AS2Educate's Gifts and Hospitality Register.

Where there is any doubt, staff should seek advice before accepting a gift or hospitality.

Conflicts of Interest

Actual, potential or perceived conflicts of interest must be declared in accordance with the AS2Educate Conflicts of Interest and Declaration of Interests Policy.

Failure to declare a conflict of interest which results in, or could reasonably be perceived to result in, improper influence over decision-making may constitute misconduct.

Procurement, Commissioning and Third Parties

Employees involved in purchasing goods or services, commissioning provision or approving expenditure must act solely in the best interests of AS2Educate.

Procurement and commissioning decisions must be:

- fair;
- transparent;
- objective;
- properly documented; and
- free from improper influence.

AS2Educate expects suppliers, contractors, consultants, commissioned providers and other third parties acting on its behalf to uphold the principles set out within this Policy.

Where evidence suggests that a third party has engaged in bribery or corruption, AS2Educate reserves the right to terminate contractual arrangements and, where appropriate, report the matter to the relevant authorities.

Reporting Concerns

Anyone who suspects bribery, corruption or other unethical conduct must report their concerns as soon as possible.

Concerns should normally be reported to:

- the Provision Manager; or
- the Assistant Provision Manager.

Where it is not appropriate to report concerns through normal management arrangements, concerns should be raised in accordance with the Confidential Reporting (Whistleblowing) Policy.

AS2Educate encourages individuals to report genuine concerns and will not tolerate victimisation or retaliation against anyone who raises a concern in good faith.

Investigating Concerns

All allegations or concerns relating to bribery or corruption will be taken seriously and investigated promptly, fairly, objectively and confidentially.

Where appropriate, AS2Educate may:

- obtain independent advice;

- appoint an external investigator;
- suspend an employee whilst investigations are undertaken;
- implement temporary management arrangements to protect the integrity of the investigation; or
- refer the matter to external agencies or law enforcement authorities.

Investigations will be conducted in accordance with AS2Educate's employment procedures and the principles of natural justice.

Breaches of this Policy

Failure to comply with this Policy may constitute misconduct or gross misconduct.

Depending upon the circumstances, breaches may result in:

- management action;
- disciplinary action up to and including dismissal;
- termination of contracts or commissioned arrangements;
- recovery of financial losses where appropriate; and
- referral to the Police or other regulatory authorities.

Any employee who deliberately makes a malicious or knowingly false allegation may also be subject to disciplinary action.

Training and Awareness

All employees will be made aware of this Policy as part of their induction and through ongoing policy updates.

Managers will ensure staff understand:
the standards expected by AS2Educate;

- how to recognise bribery and corruption;
- how to report concerns; and
- their responsibilities under the Bribery Act 2010.

Additional guidance will be provided where roles involve procurement, commissioning or financial decision-making.

Monitoring and Review

The Provision Manager will monitor the implementation of this Policy by:

- reviewing reported concerns;
- monitoring declarations of interests;
- reviewing procurement and commissioning practices where appropriate;
- identifying lessons learned from investigations; and
- ensuring this Policy remains compliant with legislation and recognised good practice.

This Policy will be reviewed annually or sooner where changes to legislation, organisational structure or operational practice require earlier review.

Reviewed by:	Richard Fihosy / Claire Ames
Policy Commencement Date:	July 2025
Ratified by:	Provision Manager and DSL
Review:	Annual
Next Review:	September 2027
Review Date: Aug 26	Full Policy review