



ST. FATIMA SCHOOL - NASR CITY

ANTI-BRIBERY AND CORRUPTION PREVENTION POLICY

Introduction

St. Fatima School – Nasr City (SFS) abides by the policy to conduct all of its activities in an honest and ethical manner and to act in good faith. We take a zero-tolerance approach to bribery and corruption and are committed to acting professionally, fairly, and with integrity in all our dealings, activities, and relationships wherever we operate and to implementing and enforcing effective systems to counter bribery.

SFS will uphold all laws relevant to countering bribery and corruption in all the jurisdictions in which we operate. This Policy is also governed by the following documents:

- [*The Bribery Act 2010*](#);
- [*League of Arab States Anti-Corruption Convention*](#) (December, 2020);
- [*United Nations Convention against Corruption*](#) (October, 2003)

The purpose of this policy is to: (a) set out our responsibilities, and of those working for us, in observing and upholding our position on bribery and corruption; and (b) provide information and guidance to those working for us on how to recognise and deal with bribery and corruption issues.

There are three key offences under this Policy

- Bribing another person
- Taking a bribe
- Failing to prevent bribery.

The School requires that all staff and all working or performing any service on or on behalf of the School neither accept nor give bribes. Staff must:

- Act honestly with integrity at all times to safeguard the School’s resources for which they are responsible;



- Comply with the law (both in spirit and in the letter);
- Abide by this policy.

Definition of Bribery

Bribery is an inducement or reward offered, promised or provided to gain personal, commercial, regulatory or contractual advantage. Bribery is a serious offence and the School does not and will not, pay bribes or offer improper inducement to anyone for any purpose. Equally the School does not and will not accept any bribes or improper inducements.

Objective of the Anti Bribery Policy

The School is committed to countering bribery and corruption in all forms and will not tolerate it in any of its activities.

Scope of the Policy

SFS has identified that the following are particular risks for SFS integrity:

- Accepting payment or donations in return for securing a place for a particular child or the appointment of a particular child to a position within the school, without following the school's usual admissions and appointment procedures;
- Accepting an invitation from a parent/carer to attend an event as their guest where the parent/carer intends to secure an improper advantage (in this case, the offence would be committed by parent/carer although there is a reputational risk to the School). If the worker acted improperly as a result, the worker would also have committed an offence;
- Accepting a lavish gift or gifts which induce someone to favour one particular student over others.

To address those risks we have communicated the content of this Policy to all the staff members of SFS.

Application of the Policy

This policy applies to all "**staff**", meaning all individuals working within the School at all levels and grades, including senior managers, officers, governors, directors, teachers, employees (whether permanent, fixed term or temporary), workers, trainees, seconded staff, volunteers, or any other person working in any context within the School.

Anti-Bribery Policy

It is unacceptable to:

- Give, promise to give, or offer payment, gifts or hospitality with the expectation or hope that a favourable advantage will be received, or to reward a favourable advantage already given
- Give, promise to give, or offer payment, gifts or hospitality to a government official, agent or representative to “facilitate” or expedite a routine procedure
- Accept payment from a third party that is offered with the expectation that it will obtain a favourable advantage for them, whether known or suspected
- Accept a gift or hospitality from a third party if it is offered or provided with an expectation that a favourable advantage will be provided by the School in return, whether known or suspected
- Retaliate against or threaten a person who has refused to commit a bribery offence or who has raised concerns under this policy
- Engage in activity in breach of this policy.

Gifts

The giving or receipt of gifts 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 favors or benefits;
- if given, it does not include cash or a cash equivalent (such as gift certificates or vouchers);
- it is appropriate in the circumstances. For example, it is customary for small gifts to be given at Christmas time;

- taking into account the reason for the gift, it is of an appropriate type and value and given at an appropriate time; and
- it is given openly, not secretly.

Specifically, we acknowledge that parents and students may choose to provide teachers and other staff with modest gifts. These are unlikely to be of any concern under the Policy unless their value is significant in which case the staff member is advised to consult the Principal or another senior manager. The intention behind the gift should always be considered.

Related Policies

The Anti-bribery and Anti-Corruption Policy must be considered alongside the following policies which collectively set out the School's approach to reducing bribery risks:

- Whistle blowing
- Code of Conduct
- Safer Recruitment Policy

Staff Responsibilities and all those working or performing any service on or behalf of the School

Prevention, detection and reporting of bribery and other forms of corruption are the responsibility of all those working for the School or under its control. All staff including third parties working or performing any service on or behalf of the School are to avoid activity that breaches this policy, and must:

- Ensure that they read, understand and comply with the Policy
- Raise concerns as soon as possible if they suspect that this policy has been breached.
- Staff must ensure that they have read, understood 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 SFS or under our control. All workers are required to avoid any activity that might lead to, or suggest, a breach of this policy.

Adequate Procedures

The procedures need to be applied proportionately based on the level of risk of bribery to the School.

Adequate procedures cover:

1. *Risk Assessment*

That the School assesses the nature and extent of its exposure to potential bribery from inside and outside and whether this has risk implications.

2. *Top Level Commitment*

The Governing body is committed to preventing bribery. Hence, the preventive procedure includes a clear statement that bribery is not acceptable communicated to all the parents, staff members of the School and to those working for the School.

3. *Effective Implementation*

The anti-bribery policy and procedures are embedded throughout the School. This means that the anti-bribery statements are embedded in the recruitment, retention, and operational policies and in training programmes.

4. *Monitoring and Review*

The School monitors and reviews its policies and procedures on a regular basis to ensure their compliance.

5. *Reporting*

SFS staff are encouraged to raise concerns about any issue or suspicion of malpractice at the earliest possible stage. If he/she is unsure whether a particular act constitutes bribery or corruption, or if he/she has any other queries, these should be raised with the Principal, Head of HR, or any other senior manager.

6. *Whistle-blowing*

SFS expects that its staff will comply with the Policy in good faith. It is also expected that in case a staff member learns about an incident of bribery involving any other staff member or a third party working for School, he/she should inform the Principal; Head of HR, or any other senior manager about the case in accordance with the procedure set out in the SFS Whistle-Blowing Policy.

Sanctions and Redress

Staff who breach this policy face the possibility of facing disciplinary action, which could result in dismissal for gross misconduct. This will be decided by the School senior management and the Head of HR. SFS reserves its right to terminate our contractual relationship with other workers if they breach this policy.

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. We aim 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.

We are 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 you believe that you have suffered any such treatment, you should inform the Head of HR immediately.

Training and Communication

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

SFS zero-tolerance approach to bribery and corruption must be communicated to the parents on the outset of relationship with them and as appropriate thereafter.

Reviewed by: J. Kovalenko (QA Manager) - August 2022

British School Principal: M. Alfred