



Bribery, Improper Behaviour and Accountability Policy

Policy statement

[1] ArtsEd is committed to ensuring acceptable standards of conduct and will not tolerate improper behaviour, bribery, or other breaches by employees, trustees, other individuals or organisations who perform services for or on behalf of ArtsEd.

[2] ArtsEd is committed to the highest standards of openness, probity, and accountability. It seeks to conduct its affairs in a responsible manner taking into account the requirements of the funding bodies and the standards in public life set by the [Committee on Standards in Public Life](#).

[3] An action is considered to be improper if it is deemed to breach the expectation that a reasonable person from the United Kingdom may have of an individual to perform the type of function or activity concerned. Whilst this does present an element of judgement, it is expected that any potential improper action is brought to the attention of the organisation as detailed in the policy below.

Purpose and scope

This policy applies to all trustees, employees and workers including volunteers.

[4] The guiding principles to be followed by trustees, employees and workers must be that:

- their conduct should not create suspicion of any potential conflict between their official duty and their private interest;
- their actions must not be influenced by a benefit (e.g., a gift or hospitality) offered or received to show favour or disfavour to any person or organisation, and nor should they give the impression to any member of the public, student, or any organisation with whom they deal, or to their colleagues that they have been (or may have been) influenced by a benefit offered or received to show favour or disfavour to any person or organisation;
- their actions must not induce or reward someone to perform a role or function improperly.
- they should not incite someone else to behave improperly in the manners described above.

Responsibilities of trustees, employees and workers

[5] Individuals should not accept any gifts, rewards, or hospitality (or have them given to members of their families) from any organisation or individual with whom they have contact in the course of their work for ArtsEd that would cause them to reach a position whereby they might be or might be deemed by others to have been influenced in deciding on an action because of accepting the gift or hospitality.

[6] While there is no requirement to report one-off token gifts (of a value up to £20), individuals should seek advice from their line manager if:

- they are offered or receive gifts of higher value; or
- they receive a succession of small gifts within a short period of time; or
- otherwise have any concern that there is an intention to influence them to change their behaviour or act improperly.

In such circumstances, the individual should record the offer and/or acceptance of the gift promptly in writing to the Principal (or other notified manager).

[7] Where hospitality is offered, the frequency and scale of hospitality accepted should not generally be significantly greater than ArtsEd would be likely to provide in return. If the frequency or scale of hospitality offered or provided is such that the employee/worker has any concern that there is an intention to influence them to change their behaviour or act improperly, they should seek advice from their line manager and record the offer and/or acceptance of the gift promptly in writing to the Principal (or other notified manager). Where hospitality is offered to a trustee, advice should be sought from the Principal and the Chair of the Board of Trustees.

[8] The tests to be applied are:

- whether in all circumstances - recognising (where appropriate) cultural expectations and accepted standards within the sector - the gift or hospitality is reasonable and justifiable;
- and, what is the intention behind the gift.

When it is not easy to decide between what is and what is not acceptable in terms of gifts or hospitality, advice should be sought from the Head of HR or the Principal.

[9] Depending on the circumstances, the appropriate action may be to:

- accept and keep the gift or hospitality;
- accept the gift but raffle it among colleagues and donate the money to charity;
- accept the gift but share it with colleagues;
- politely decline the gift or hospitality;
- make clear to the donor that the recipient of the gift will not be involved in decision making relating to ArtsEd business with the donor.

[10] Individuals should not offer any gifts, rewards, or hospitality to any organisation or individual with whom they have contact in the course of their work for ArtsEd that would create a position whereby the recipient might be or might be deemed by others to have been influenced in deciding on an action because of accepting the gift or hospitality.

[11] Individuals should also take account of their responsibilities under other related policies and procedures, including:

- The Staff Handbook;
- [The Staff Code of Conduct](#)
- [Whistleblowing Policy and Procedure](#)

[12] The prevention, detection and reporting of bribery and other forms of corruption and improper conduct are the responsibility of all employees, trustees and workers. All individuals covered by this Policy are required to avoid any activity that might lead to or suggest a breach of this Policy.

[13] Employees, trustees and workers have a responsibility to ArtsEd to report to the Principal (or other notified manager) any concerns they may have about possible breaches of this Policy, including potential improper conduct by individuals or organisations outside ArtsEd (for example, potential suppliers, donors or

students). The [Whistleblowing Policy](#) should be used if it is not appropriate to report concerns to the Principal or the Chair of Trustees.

[14] Individuals who breach this Policy are liable to disciplinary action which may lead to their dismissal.

Notes

(1) Under the [Bribery Act 2010](#), a bribe is a ‘financial or other advantage’ offered, promised, or given to induce a person to perform a relevant function or activity improperly, or to reward them for doing so. The Act makes it a criminal offence to:

- offer, promise or give a bribe;
- request, agree to receive or accept a bribe;
- bribe a foreign public official to obtain or retain business or a business advantage;
- fail to prevent bribery by those acting on behalf of the organisation (‘associated persons’) to obtain or retain business or a business advantage for the organisation.

Small payments made to any official to make something happen, or happen sooner, (commonly called facilitation payments) are likely to be bribes and unlawful under the Act.

(2) This includes permanent staff, temporary workers, volunteers, self-employed and agency workers (all are categorised as ‘employees’).

(3) A register of gifts offered and/or received, other than one-off token gifts which do not have to be reported, will be maintained by ArtsEd for audit purposes.

Policy/Procedure	Bribery, Improper Behaviour and Accountability Policy
Maintained By	Head of HR
Owned By	Head of HR
Approving Committee / Ratifying Body	Finance Committee
Last Reviewed on	March 2022
Review on	March 2025
Current Version	Version 1
Location of master document	https://teams.microsoft.com/l/channel/19%3aw-ekhrkvUAYf-poCislpXAtITMpMervHPnfaS00NC_Y1%40thread.tacv2/General?groupId=fe70d9e8-8216-4003-922e-b9bfe9e5fb9c&tenantId=02f4a62e-6e9d-4607-974c-7de2591c4698
Web location	