



Anti-Bribery Policy

Updated September 2024

At Briar Dene Childcare, we are committed to maintaining the highest standards of ethical conduct, integrity, and transparency in all our activities. We have a zero-tolerance policy towards bribery and corruption in any form. This policy aims to prevent bribery within the nursery by setting clear expectations for staff, volunteers, parents, and all other parties involved with the nursery, ensuring that all business dealings and relationships are conducted in an open, honest, and lawful manner.

The purpose of this policy is to:

- Ensure compliance with relevant laws and regulations regarding bribery and corruption.
- Prevent and deter bribery in any form, both within the nursery and in interactions with external parties.
- Promote a culture of integrity and accountability.
- Provide clear guidance to staff and others involved in the nursery about what constitutes bribery and the consequences of engaging in such behaviour.

Definition of Bribery:

Bribery is defined as the offering, giving, receiving, or soliciting of any item of value with the intention to influence the actions of an individual or organisation, or to obtain an unfair advantage. This includes:

- Offering or receiving gifts, money, or benefits in exchange for favourable treatment or decisions.
- Giving or receiving anything of value to influence actions, such as admission or preferential treatment in the nursery setting.
- Using the position of authority within the nursery to request or receive undue benefits or rewards.

Prohibited Actions:

The following actions are strictly prohibited under this policy:

- **Offering or accepting bribes:** No staff member, volunteer, or associated individual should offer, accept, or solicit any bribe, kickback, or other improper benefit.
- **Gifts and hospitality:** Offering or receiving gifts or hospitality in exchange for personal or professional gain is prohibited. Exceptions may apply for minor, non-monetary gifts or hospitality given in a transparent manner and in accordance with nursery guidelines.
- **Conflict of interest:** Staff must avoid situations where their personal interest's conflict with their professional duties, and they must not use their position to gain personal benefits.
- **Facilitation payments:** Small payments made to speed up administrative processes or services are strictly prohibited, regardless of how small or routine they may seem.

Gifts and Hospitality:

1. General Principles:

Gifts, hospitality, and entertainment offered or received by staff must be modest, transparent, and not intended to influence any decisions or actions. The exchange of gifts should not exceed reasonable or customary amounts and must be in alignment with the nursery's ethos of fairness and equality.

2. Approval Process:

Any gifts, hospitality, or benefits received by staff must be disclosed to the Nursery Manager or designated person. All gifts or hospitality over a specified value (e.g., £20) should be approved by the management before being accepted. A register of gifts and hospitality will be maintained.

3. Exceptions:

- Small tokens of appreciation (e.g., promotional items such as pens or calendars) may be accepted if they are of minimal value and offered in a transparent manner.
- Gifts given during formal relations (e.g., a gift for a child from a parent) will be reviewed on a case-by-case basis.

Responsibilities:

1. Staff Responsibilities:

- All staff must comply with this policy and immediately report any suspicions or concerns regarding bribery or corruption.
- Staff should avoid situations where their actions could be perceived as unethical or improper.
- Staff should report any incidents of bribery or suspected bribery to the Nursery Manager or designated compliance officer.

2. Management Responsibilities:

- Management is responsible for ensuring the implementation and adherence to this policy.
- Management should create a culture of transparency, fairness, and zero tolerance toward bribery and corruption.
- Management should provide training on anti-bribery policies and ensure that all staff understand their responsibilities and the consequences of non-compliance.

Reporting and Whistleblowing:

1. Reporting Concerns:

Any individual who believes that bribery or corruption is taking place at Briar Dene Childcare is encouraged to report the matter immediately. This can be done through:

- Reporting to the Nursery Manager or the designated anti-bribery compliance officer.
- Using the nursery's whistleblowing procedures if the matter is not appropriately addressed by the manager.

2. Confidentiality and Protection:

The nursery will handle all reports of bribery or corruption confidentially and will take appropriate action in accordance with our safeguarding and whistleblowing procedures. Staff members who report concerns in good faith will be protected from retaliation or any form of reprisal.

Consequences of Breaching the Policy:

Any staff member or individual found to have engaged in bribery or corruption will be subject to disciplinary action, which may include:

- Verbal or written warnings.

- Suspension or termination of employment.
- Legal action, where applicable.

The severity of the consequences will depend on the seriousness of the violation and may include criminal prosecution, where necessary.

Training and Awareness:

1. **Staff Training:**

All staff will undergo regular training on the anti-bribery policy, including how to identify and avoid bribery-related situations, how to report concerns, and the consequences of breaching the policy.

2. **Ongoing Review:**

This policy will be reviewed regularly and updated as necessary to ensure it remains effective and compliant with all relevant legal and regulatory requirements.

Briar Dene Childcare is committed to operating with the highest standards of integrity, honesty, and transparency. This anti-bribery policy demonstrates our dedication to preventing bribery and corruption and ensures that our business practices remain fair and ethical.

Review of Policy:

This policy will be reviewed annually (September 2025), or as needed, to ensure that it remains relevant and effective in meeting the evolving needs of the children, families, and staff within the nursery.

Name:	Position:	Signed:	Date:
David Birkbeck	Owner		
Kayleigh Tydd	Director		
Greg Bamber	Nominated Individual		
Zoe Tydd	Manager & DSL		
Abbie Lloyd	Deputy Manager		
Jade Radcliffe	Second Deputy Manager		
Pamela Lear	Practitioner		
Diane Jones	Practitioner		
Emily Gautrey	Practitioner		