
HR Policies and Procedures

Anti Bribery & Corruption

For all NFER Staff

National Foundation for Educational Research (NFER)

Restricted

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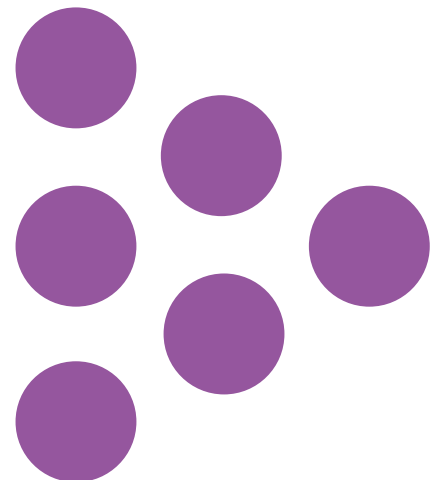
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Introduction

Bribery is the accepting of gifts, money, hospitality or other favours in return for providing something of value to the briber. Corruption is the abuse of power for personal gain. The purpose of this policy is to set out the rules that must be followed by all NFER staff, both permanent and temporary, to ensure that no bribery or corruption occurs.

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1 Unacceptable behaviour

The following behaviour is unacceptable, and must not occur in this organisation:

- accepting any financial or other reward from any person in return for providing some favour
- requesting a financial or other reward from any person in return for providing some favour
- offering any financial or other reward to any person in return for providing some favour.¹

2 Business gifts

From time to time, customers, suppliers or other persons might offer a gift to a member of staff. This could be a small item, or something of considerable value. All gifts, however small, must be reported to the Head of Department and recorded. No gifts with a value of more than £50 may be accepted. If a gift is offered and then refused because of its value, this must be reported to the Head of Department. Any gift of value (more than £50) inadvertently received by staff should be handed to the Head of HR who will arrange for its return or disposal. All proceeds of disposal will be given to a children's charity.

3 Hospitality

From time to time, customers, suppliers or other persons might invite a member of staff to a hospitality event. Staff are encouraged to build relationships with clients and other business partners and to network at appropriate events such as receptions.

All such invitations must be logged with the Head of Department and the member of staff must be satisfied that their attendance at the event cannot be construed as responding to an act of bribery. If the staff member has any concerns they should raise them with their line manager.

4 Offering gifts and hospitality

NFER occasionally runs hospitality events, primarily aimed at thanking customers and suppliers for their custom and loyalty. Staff must not organise any additional hospitality event without seeking authority in writing from their Head of Department.

5 Responsibilities of the Head of Department

Heads of Department are responsible for keeping a record of all gifts and hospitality that are offered and/or received by staff working in their area of responsibility.

If Heads of Department are concerned about any actions, they should contact the Head of HR immediately for advice.

¹ Discounts offered to clients or prospective clients with the aim of securing new work is an acceptable business practice. However all discounts need to be approved by a Head of Centre or a member of the SMT in advance of being proposed.

Heads of Department are also responsible for ensuring that all their staff are aware of this policy, and fully understand the rules in relation to the acceptance of gifts and hospitality.

6 Expenses

The relevant budget holder must authorise all expense claims from staff in Agresso in line with the most recently approved NFER Expenses policy.

Any items of expenditure that give rise to concern should be fully investigated and any queries over the interpretation of the Expenses policy should be raised with the Head of HR.

7 Attempts to bribe

Any staff who are concerned that he/she is potentially being bribed or is concerned that they have found evidence of corruption should report this matter to their Head of Department and Head of HR immediately.

8 Donations to organisations

NFER makes occasional donations as an organisation to charity. These donations are managed by SMT members, after discussion with the CEO.

Other donations can be made as individuals through the NFER Social Committee following charity fund raising events.

No donations should be made on behalf of NFER to companies, charities, political parties or other organisations with the intention of gaining a business advantage.

9 Disciplinary action

Any staff found to have offered or accepted a bribe or to be involved in any corrupt transaction will face disciplinary action which could include dismissal for gross misconduct.

10 Raising concerns

If a member of staff is concerned that acts of bribery or corruption are occurring in NFER they should inform their Head of Department, and the Head of HR, immediately.

Staff should also refer to the NFER “Whistle Blowing Policy”