



## 10.8 Our Anti-bribery Policy

At Little Gillies we have this policy to ensure that we have adequate procedures in place that are proportionate to the bribery risks we face.

It is our policy to conduct all of our business in an honest and ethical manner. We take a zero-tolerance approach to bribery and corruption and are committed to acting professionally, fairly and with integrity in all our dealings wherever we operate. We are also committed to implementing and enforcing effective systems to counter bribery.

### **What is a bribe?**

A bribe is a financial or other advantage offered or given:

- to anyone to persuade them to or reward them for performing their duties improperly or;
- to any public official with the intention of influencing the official in the performance of his/her duties.

### **Gifts and hospitality**

A 'gift' is defined as any item, cash, goods, or any service which is offered for personal benefit at a cost, or no cost, that is less than its commercial value.

You should consider the following if a gift is offered:

- Whether it is appropriate to accept it;
- Decline gifts unless to do so would cause serious embarrassment; and
- Discuss the position with the manager or owner if the gift clearly has a value in excess of £25

Parents may wish to thank nursery staff for looking after their children with Christmas gifts or gifts when the child moves on from a particular room or leaves the nursery. This is perfectly understandable. Each staff member is responsible for deciding if this gift is appropriate to accept and if it should be shared with the wider team. If in any doubt staff should discuss this with the nursery manager.

The nursery will not accept gifts from service providers. This may be deemed as a bribe to maintain a contract. The nursery will remain transparent and open at all times.



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All policies and procedures are implemented, reviewed and updated on an annual basis or in line with any changes to local and national guidance/legislation in conjunction with the registered person.

This policy was adopted at a meeting of Little Gillies

Held on.....

Date to reviewed .....

Signed on behalf of the provider.....

Name of signatory.....

Role of signatory.....

Reviewed by Sarah Beresford

Date June 2023