

Anti-Bribery and Corruption Policy

Keystage Education LTD | Version 1.0 | Reviewed August 2026 | Next review August 2027

Keystage Education LTD has a zero-tolerance approach to bribery and corruption. We are committed to acting professionally, fairly and with integrity, and to complying with the Bribery Act 2010 in all our dealings.

What this covers

This policy applies to all directors, employees, consultants, contractors, candidates and anyone acting for or on behalf of Keystage Education, wherever they are located.

Bribery	Offering, promising, giving, requesting or accepting a financial or other advantage to induce or reward improper performance of a function or activity.
Facilitation payments	Small unofficial payments to secure or speed up a routine action. These are bribes and are prohibited, however small and however common they may be elsewhere.
Kickbacks	Payments made in return for a business favour or advantage. Prohibited.

What is not allowed

- Offering or accepting anything intended to influence a placement decision, a booking, the award of a contract or a supplier arrangement.
- Offering or accepting cash or cash equivalents such as gift cards, in any amount.
- Making a payment to a school employee, a client contact or a candidate to secure or retain business.
- Accepting a payment or gift from a candidate in return for putting them forward, prioritising them, or overlooking a compliance requirement.
- Using a third party, agent or intermediary to do anything that would breach this policy.
- Making a political donation on behalf of the business.

A candidate offering money, gifts or favours in return for work, or to have a compliance requirement waived, is attempting to bribe you. Refuse it, report it to the Director the same day, and do not put the candidate forward pending review.

Gifts and hospitality

Modest, proportionate and transparent hospitality given or received in the normal course of business is acceptable. It must be reasonable, not lavish, not given at a time when it could influence a decision, and never in cash.

- Any gift or hospitality with a value above £100 must be approved in advance by the Director and recorded in the gifts and hospitality register.
- Promotional items of nominal value and ordinary working refreshments do not need to be recorded.
- If you are unsure whether something is acceptable, ask before accepting it, not afterwards.

Your responsibilities

Everyone must read, understand and comply with this policy, and must avoid any activity that could lead to a breach. You must raise any concern as early as possible — a suspicion is enough, and you do not need proof.

Reporting a concern

Report to the Director, Abdullah Iqrar, at abdullah@keystage-education.co.uk or 0208 057 9509. Where the concern involves the Director, use the alternative contact in our Whistleblowing Policy. Concerns may be raised in confidence and are protected disclosures under the Public Interest Disclosure Act 1998. Nobody who raises a concern in good faith will suffer any detriment.

Consequences

Breach of this policy will be treated as gross misconduct and may result in dismissal or removal from our candidate register. Bribery is a criminal offence carrying up to ten years' imprisonment and an unlimited fine for individuals. A company that fails to prevent bribery by an associated person commits an offence under section 7 of the Bribery Act 2010, with a defence of having adequate procedures in place. This policy, and the training and record-keeping behind it, form part of those procedures.

Monitoring

The Director reviews this policy and the gifts and hospitality register at least annually. Training is provided at induction and refreshed annually.