

Anti-Bribery, Gifts, Hospitality and Ethical Practice Policy

Legislative Framework

This policy is based on the requirements of the **Bribery Act 2010** and supports the nursery's commitment to maintaining the highest standards of honesty, integrity and professional conduct.

The Bribery Act 2010 creates offences relating to offering, promising, giving, requesting or accepting bribes and places responsibilities on organisations to have appropriate procedures in place to prevent bribery and corruption.

At The Orchard Day Nursery Kingston, we are committed to conducting all business fairly, transparently and ethically. We operate a zero-tolerance approach to bribery, corruption, fraud and conflicts of interest.

This policy should be read alongside our Code of Conduct, Whistleblowing Policy, Safeguarding and Child Protection Policy, Behaviour Policy, Healthy Eating Policy and Complaints Policy.

Our Commitment

We will:

- Act honestly and transparently in all business dealings
- Make decisions that are in the best interests of children and families
- Ensure contracts and purchasing decisions are fair and objective
- Avoid conflicts of interest
- Maintain accurate financial and business records
- Comply with all relevant legislation
- Encourage staff to raise concerns without fear of reprisal.

What is Bribery?

A bribe is any financial or other advantage offered, promised, requested or accepted with the intention of influencing someone's behaviour or obtaining an improper business advantage.

Bribery may include:

- money
- gifts
- hospitality
- discounts
- loans
- services
- favours
- promises of employment
- preferential treatment
- any other benefit intended to influence decision making.

Gifts and Hospitality

We recognise that parents often wish to thank staff for the care they provide, particularly at Christmas or when a child leaves the nursery.

Small tokens of appreciation may be accepted where they:

- Are given openly
- Are not intended to influence professional judgement
- Are of modest value
- Would not place the member of staff under any obligation.

Staff should always use professional judgement when accepting gifts.

Any gift with an estimated value exceeding **£25** must be discussed with the Nursery Manager before being accepted.

Where appropriate, gifts may be shared amongst the wider team.

Cash gifts should not normally be accepted. If offered, staff should politely decline or seek guidance from the Nursery Manager.

Gifts from Contractors and Suppliers

To protect the integrity of our procurement processes:

- Staff must not request gifts from suppliers
- Gifts or hospitality from contractors, suppliers or businesses seeking to provide services to the nursery should normally be declined
- Any offers of gifts or hospitality must be declared to the Nursery Manager
- All accepted or declined gifts from suppliers will be recorded in the Gift Register.

This ensures that purchasing decisions remain transparent, fair and free from undue influence.

Conflicts of Interest

Staff must declare any personal, financial or family interests that could influence, or appear to influence, decisions made on behalf of the nursery.

Where a conflict exists, appropriate steps will be taken to ensure decisions remain impartial.

Ethical Practice with Children

Whilst this policy relates primarily to business bribery, we also believe that children should never be manipulated or pressured through inappropriate rewards or incentives.

Our approach is based on respect, positive relationships and supporting children's intrinsic motivation rather than using rewards as a form of control.

Practitioners will:

- Encourage and praise children's efforts, perseverance and achievements
- Recognise individual progress and development
- Use positive language, encouragement and modelling
- Support children to develop independence and self-confidence.

Staff will not:

- Bribe children to eat or finish meals
- Promise sweets, treats or desserts in exchange for eating food

- Require children to finish meals before accessing preferred activities
- Use stickers, prizes or treats to force children to use the toilet
- Withhold food, comfort or affection as a consequence of behaviour
- Use rewards to pressure children into participating in activities against their wishes
- Use food as either a reward or a punishment.

Children will always be encouraged to listen to their own feelings of hunger and fullness. Mealtimes will remain positive, relaxed social occasions where children are encouraged but never forced or pressured to explore a variety of healthy foods.

Similarly, toileting routines will be child-centred, developmentally appropriate and carried out in partnership with parents.

Professional Recognition

The nursery values positive recognition and encouragement.

Staff may celebrate children's:

- Kindness
- Perseverance
- Independence
- Cooperation
- Problem-solving
- Resilience
- Helpfulness

All through verbal praise, shared celebration with families, acknowledgement of achievements and age-appropriate recognition that focuses on effort rather than compliance. Any reward systems used within the nursery will support children's emotional wellbeing and intrinsic motivation rather than encouraging compliance through external incentives.

Reporting Concerns

Any employee who suspects bribery, corruption, fraud or unethical practice must report their concerns immediately to the Nursery Manager.

Concerns will be investigated promptly, fairly and confidentially.

Staff who raise genuine concerns in good faith will be supported in accordance with the nursery's Whistleblowing Policy.

Monitoring

The Nursery Manager will maintain:

- A Gift and Hospitality Register
- Records of declared conflicts of interest
- Appropriate procurement records
- Regular reviews of financial procedures.

Failure to comply with this policy may result in disciplinary action and, where appropriate, referral to external agencies.

This policy will be reviewed annually or sooner if legislation or guidance changes.

This policy was adopted on	Signed on behalf of the nursery	Date for review
<i>05/08/2026</i>	F.Joyce	<i>December 2026</i>