

Anti-Corruption Policy

Policy statement

The Royal Academy of Dance (RAD) is committed to acting openly with integrity and professionalism, ensuring that the highest standards of honesty are maintained. We operate a zero-tolerance approach to the making or receiving of bribes or corrupt payments in any form. This type of conduct is prohibited whether committed by employees or anyone else associated with and acting on behalf of the Royal Academy of Dance, anywhere in the world.

This policy has been written in accordance with the Academy's obligations under the UK's Bribery Act 2010.

1 Policy aims

- 1.1 This policy sets out what the RAD should do to prevent corruption in all its forms. A corrupt payment or bribe may include any payment, promise, request, agreement, donation, benefit, or gift offered or given with the purpose of influencing a decision or outcome.
- 1.2 It is recognised that market practices vary across the world in which the RAD operates and what is accepted as normal business practice in one territory may not be accepted in another. The RAD is, however, fully committed to complying with its obligations under applicable legislation, including the Bribery Act 2010 (the Act) and ensuring that no corrupt payments or bribes are made, offered, sought or obtained by anyone acting on our behalf to anyone, anywhere in the world.

2 Policy scope

- 2.2 This policy is applicable to all RAD employees, which for the purposes of the policy includes and refers to National Directors, National Managers, Representatives working for third party organisations, Trustees and other office holders. It also applies to consultants, contractors, agents and anyone working on the RAD's behalf anywhere in the world, hereinafter referred collectively as "employee" or "employees".
- 2.3 It is important for all employees to read and comply with this policy. It is also the responsibility of everyone to prevent, detect and report corruption in any form.

3 Failure to comply

- 3.1 Any act of corruption, in whatever form or value, is unacceptable.
- 3.2 An employee's failure to comply with this policy will be treated seriously and may result in disciplinary action up to and including dismissal. Failure to comply with this policy may also leave an employee open to criminal prosecution under the Act.

- 3.3 A breach of this policy by an employee could result in the RAD breaching the Act, which could result in the RAD being fined and would be likely to lead to damage to the RAD's reputation.

4 Prohibited conduct

- 4.1 The following is a non-exhaustive list of prohibited behaviour under this policy:-
- Making unofficial offers, promises, requests or payments to anyone and particularly public officials in order to obtain an advantage.
 - Appointing a third party, supplier to act on behalf of the RAD or engaging with a donor who you know or have good reason to believe to have engaged in any corrupt or unlawful conduct including offences under the Act.
 - Pay any third party to make connections for the RAD where the payment would give an advantage anywhere in the world, for example in a potential new market region.

5 Gifts, hospitality & entertainment

- 5.1 Employees are expected to conduct themselves with integrity, impartiality and professionalism at all times.
- 5.2 Employees must maintain a high standard of professionalism and not open themselves up to suspicion of dishonesty or put themselves in a position of conflict between their work and private interests. Gifts and entertainment given and received as a reward, inducement or encouragement for preferential treatment, or inappropriate or dishonest conduct are strictly prohibited.
- 5.3 No gifts, hospitality or entertainment should be given during a tender process or during contractual negotiations, if there is any realistic risk that such gifts or entertainment could influence the outcome of such processes or negotiations.
- 5.4 Employees may not accept any gifts from suppliers, teachers, students or other contacts whether by payment, goods, or discounts, unless the gift is of value of less than £100.00 (or equivalent).
- 5.5 Any gifts offered by third parties to RAD employees of a higher value than £100.00 (or equivalent) should be declined. If it is impossible or difficult to decline such a gift, which can be the case in some business situations in some parts of the world, the nature of the gift should be declared and reported to the Anti-Corruption Officer (Chief Operating Officer), so that details may be kept on the RAD's Gift Register. Such higher value gifts should also be given to the RAD so that appropriate arrangements can be made.
- 5.6 Any gifts offered by RAD employees must be proportionate and acceptable within the policy of the individual's employer/organisation and/or within the legislation (or custom) of their country. Gifts or entertainment offered which are higher than the norm should be agreed in advance by the Executive Board and details of the expenditure should be recorded by the Anti-Corruption Officer, to demonstrate the RAD's commitment to ethical practice.

- 5.7 RAD employees may receive corporate event/entertainment invitations from suppliers and /or others. It is acceptable to accept such invitations if: -
- Employees or personnel from the supplier or the person offering the entertainment are present.
 - Accommodation expenses or significant travel expenses (other than those described above) are not paid for by the supplier or person.
 - The acceptance of the entertainment could not be interpreted as a reward, inducement or encouragement for preferential treatment.
- 5.8 Reciprocal entertainment may be offered by RAD employees, subject to the agreement of the Chief Executive or National Director, National Manager or RAD Representative, as the case maybe.
- 5.9 In some circumstances a school may invite an RAD representative to a school event or show, and in doing so pay for travel and accommodation. It is permissible to accept an offer such as this where the intention is not to use the presence of an RAD employee as an official endorsement of the school. The visit should also be used to undertake where possible other RAD business so that it is clear the Academy does not profit from acceptance of such a visit.

6 Due diligence

- 6.1 All new suppliers should be asked at the time of appointment to agree to this policy and where the contract is of a value of over £100,000 (or equivalent) the RAD will undertake a corporate risk assessment when entering a new market or territory.
- 6.2 Due diligence processes will be carried out for donors in accordance with the RAD's Ethical Fundraising Policy.

7 Sources of advice

- 7.1 If an employee is in doubt about a situation with which they are presented they are able to seek advice by contacting the Chief Operating Officer (Anti-Corruption Officer).
- 7.2 If an employee requires confidential support, they should contact the Head of People.

8 Suspicions of corruption

- 8.1 The RAD aims to conduct business with the highest standards of ethics, honesty and integrity and recognises that employees have an important role to play in maintaining this aim. Any employee concerned about any form of malpractice, improper action or wrongdoing by the RAD, its employees or others are encouraged to report the matter.
- 8.2 The RAD believes it is essential to create an environment in which employees feel able to raise any matters of genuine concern internally without fear and that matters raised will be taken seriously and investigated appropriately and as far as possible kept confidential.

8.3 The RAD believes that any employee with knowledge of corruption of any form should not remain silent. Employees are encouraged to raise incidents or behaviours that are not in accordance with this policy by using the procedure as follows:-

- In the first instance, an employee should consider raising concerns with their line manager or Director, who will have a responsibility to listen and respond to any matter that is of concern to them. Concerns can be raised informally, verbally or in writing. The line manager or Director will determine whether they are able to investigate the matter themselves or whether it needs to be escalated to the Anti-Corruption Officer.
- If an employee feels unable to raise the concern with their line manager or Director, they should contact the Anti-Corruption Officer directly.
- The Head of People will be kept informed, as necessary and will be able to offer HR support.

9 Policy publication

9.1 This policy is available to all employees on the cross departmental shared drive, and it is drawn to the attention of new employees at induction. The policy is also published on the RAD corporate website.

10 Policy Review

10.1 This policy is reviewed on a bi-annual basis (and sooner if necessary) by the Head of People, senior management and the Board of Trustees.

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