

Financial Integrity Policy

For third parties

1. Policy Statement and Scope

Challenge Partners operates with an absolute commitment to integrity, honesty, and transparency, maintaining a zero-tolerance stance against bribery, corruption, and financial crime. This policy applies to all contractors and third-party representatives of Challenge Partners as a mandatory condition of engagement. Compliance with these standards is explicitly integrated into and linked with our **Code of Conduct**.

2. Core Standards and Prohibited Conduct

Contractors working with or representing Challenge Partners must strictly comply with the **UK Bribery Act 2010**. The following actions are strictly prohibited and constitute a fundamental breach of contract:

- **Bribery:** Offering, promising, giving, requesting, or accepting any financial or non-financial inducement to secure a commercial, contractual, or personal advantage.
- **Facilitation Payments:** Making informal "grease payments" to expedite routine administrative actions.
- **Conflicts of Interest:** Failing to declare any personal or professional conflict of interest.
- **Non-Disclosure:** Remaining silent or failing to report suspected corrupt activity.
- **Retaliation:** Engaging in any form of retribution against individuals who report suspected violations.

3. Gifts and Hospitality Rules

Gifts and hospitality must always be reasonable, proportionate, and necessary for promoting goodwill, and must never be used to influence professional judgment or business decisions.

- **Gifts Over £35:** Any gift or hospitality offered or received with an estimated value exceeding **£35** must be reported to and logged with the **Head of Programmes and Networks** (for Quality Assurance Review, Growing the Top, SEND Developmental Peer Review, Trust Peer Review and Trust Leaders' Network) or the **Head of Partnership Reach and Experience** (for Hubs and Reach activities).
- **High-Value Gifts (£75+):** Gifts valued over **£75** must be politely declined unless refusal would cause severe cultural offence or damage a critical partnership. In such exceptional cases, acceptance requires explicit prior approval from the **Head of Programmes and Networks** (for Quality Assurance Review, Growing the Top, SEND Developmental Peer Review, Trust Peer Review and Trust Leaders' Network) or the **Head of Partnership Reach and Experience** (for Hubs and Reach activities).

CHALLENGE PARTNERS

Exemptions:

- Standard working meals (e.g., breakfast snacks, light sandwich lunches) and continuous light refreshments (water, tea, coffee, light snacks) provided during full-day programme and training events, briefings, or conferences are classified as ordinary operational hospitality and do not require logging.
- Standard routine subsistence provided by a school or trust during on-site school improvement programmes is exempt from logging.

4. Safeguarding and DBS Requirements

- **Safeguarding & DBS Checks:** Contractors deployed on school and trust improvement programmes must fully adhere to the **Challenge Partners Safeguarding Policy**. Mandatory Disclosure and Barring Service (DBS) checks are required for relevant personnel to ensure child protection and verify professional integrity.

5. Reporting and Enforcement

- **Reporting Concerns:** Any suspected breach or deviation from this policy must be reported immediately to the **Director of Finance & Operations**. Concerns regarding non-adherence by Challenge Partners personnel should be reported directly to whistleblowing@challengepartners.org.
- **Enforcement:** Adherence is strictly enforced. Any violation represents a serious disciplinary matter and breach of contract, resulting in contract termination and, where statutory duties are breached, potential referral to law enforcement.