



# **Anti-corruption and Bribery Policy**

Approval date: May 2024

## **1. About this policy**

- 1.1. 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 business dealings and relationships.
- 1.2. Any employee who knowingly breaches this policy may face disciplinary action, which could result in summary dismissal for gross misconduct. Any non-employee who breaches this policy may have their contract terminated with immediate effect.
- 1.3. The Trust has overall responsibility for this policy, including keeping it under review.
- 1.4. This policy does not form part of any employee's contract of employment. It will be reviewed regularly.

## **2. Who must comply with this policy?**

- 2.1. This policy applies to all persons working or providing services at any school within the Trust or on our behalf in any capacity, including employees at all levels, directors, trustees, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives and business partners.

## **3. What is bribery?**

- 3.1. Bribe means a financial or other inducement or reward for action which is illegal, unethical, a breach of trust or improper in any way. Bribes can take the form of money, gifts, loans, fees, hospitality, services, discounts, the award of a contract or any other advantage or benefit.
- 3.2. Bribery includes offering, promising, giving, accepting or seeking a bribe.
- 3.3. All forms of bribery are strictly prohibited. If you are unsure about whether a particular act constitutes bribery, raise it with your manager or Headteacher/head of school/head of school.
- 3.4. Specifically, you must not:
  - 3.4.1. give or offer any payment, gift, hospitality or other benefit in the expectation that a business advantage will be received in return, or to reward any business received;
  - 3.4.2. accept any offer from a third party that you know or suspect is made with the expectation that we will provide a business advantage for them or anyone else;

- 3.4.3. give or offer any payment (sometimes called a facilitation payment) to a government official in any country to facilitate or speed up a routine or necessary procedure.
- 3.5. You must not threaten or retaliate against another person who has refused to offer or accept a bribe or who has raised concerns about possible bribery or corruption.
- 4. **Gifts and hospitality**
  - 4.1. This Trust does not prohibit the giving or accepting of reasonable and appropriate gifts or hospitality for legitimate purposes such as building relationships, maintaining our image or reputation, or marketing our products and services, in accordance with the Gifts and Hospitality Policy – found at section 2.3 of this handbook.
- 5. **How to raise a concern**
  - 5.1. If you are offered a bribe, or are asked to make one, or if you suspect that any bribery, corruption or other breach of this policy has occurred or may occur, you must report it in accordance with our Whistleblowing Policy as soon as possible.