

# STANBRIDGE EARLS SCHOOL TRUST

## Anti-Bribery Policy

### 1. Introduction

1.1 Stanbridge Earls School Trust (the School) requires its staff and any other persons acting on its behalf, at all times to act honestly and with integrity and to safeguard the resources for which they are responsible.

1.2 The School is committed to ensuring that its business is conducted in an open and transparent manner and it will take all appropriate steps to address the risks of bribery.

1.3 The School condemns all acts of bribery or corruption; any cases brought to its attention will be investigated exhaustively and dealt with appropriately.

1.4 The School is committed to the highest international standards of integrity and to ensuring it adheres to and promotes best practice in bribery prevention.

### 2. Definition & Scope

2.1 Bribery is commonly described as the offer or acceptance of a reward to persuade another to act dishonestly and or in breach of the law.

2.2 It includes the offering, promising, giving, receiving or soliciting of a financial, academic or other advantage or favour as a means to influence the actions of an individual (or individuals).

2.3 The Bribery Act 2010, due to come in force on 1<sup>st</sup> July 2011, provides for 4 bribery offences:

- Bribing: offering, promising or giving an advantage;
- Being bribed: requesting, agreeing to receive an advantage or accepting an advantage;
- Bribing a foreign public official;
- Failing as an organisation to prevent a bribe being paid on its behalf.

2.4 The School will work at the highest level to adopt and adhere to the six principles of bribery prevention outlined in the Government's guidance, and will set out clear anti-bribery procedures for its staff and for those persons who represent the School.

2.5 The School has in place a robust Public Interest Disclosure (whistleblowing) policy to enable concerns to be brought to its attention.

### **3. Responsibilities**

3.1 The School is responsible for issuing relevant procedures for the prevention, detection, reporting and handling of bribery and for making all relevant persons aware of the necessity of complying with this policy.

3.2 The Property & Risk Committee has a general responsibility for monitoring the operation and effectiveness of anti-bribery arrangements and should receive appropriate reports on any bribery activity.

3.3 Each member of staff or pupil or other person who performs a service or otherwise represents the School is responsible for:

- acting with propriety at all times and in particular in the use of official resources and the handling and use of school funds;
- conducting themselves with integrity, objectivity, accountability, openness, honesty and leadership;
- being alert to the possibility that unusual events, behaviours or transactions could be an indication of bribery;
- reporting details immediately through the appropriate channel if they suspect bribery is taking or has taken place;
- cooperating fully with whomever is conducting internal checks, reviews or investigations.

### **4. Applicability**

4.1 This Policy extends to all of the Schools activities and operations and to all of its dealings and negotiations with third parties in all countries in which its staff, pupils, subsidiaries and, agents operate.

4.2 All employees and pupils and all individuals working on behalf of, under contract from or in collaboration with any part of the School or with any of its employees or pupils are required to comply with this Policy.

### **5. Action in the Event of Bribery**

5.1 All cases of actual or suspected bribery will be vigorously and promptly investigated and appropriate action will be taken. The police will be informed where considered appropriate.

5.2 In addition, disciplinary action will be considered, not only against those members of staff found to have perpetrated bribery, but also against heads of department whose negligence is held to have facilitated or condoned an act of bribery. Both categories can be held to constitute gross misconduct, the penalty for which may include summary dismissal.

**The Governors Stanbridge Earls School Trust  
June 2011**