



**OUR LADY  
OF LOURDES**

CATHOLIC MULTI-ACADEMY TRUST

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# Anti Bribery and Corruption Policy



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| <b>Title of policy:</b>                               | Anti Bribery and Corruption Policy                                                   |
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| <b>Reviewer:</b>                                      | Rachel Abbott – Head of Finance<br>Finance and Estates Committee<br>OLoL Trust Board |
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## 1. Introduction

The term "Trust" refers throughout to Our Lady of Lourdes Catholic Multi-Academy Trust and any Academy within the Trust.

The Bribery Act became law on 1 July 2011. It replaces what are collectively known as the Prevention of Corruption Acts 1889 to 1916. It is designed to address bribery and corruption in the public and private sectors and will mean that any incorporated organisation will be liable to severe penalties if they fail to implement adequate procedures to prevent bribes being paid or received on their behalf.

There are four key offences under the Act

- **Bribing another person** - This can occur where a person offers, promises or gives a financial or other advantage to another individual to perform improperly a relevant function or activity
- **Taking a bribe** - This is where a person receives or accepts a financial or other advantage to perform a function or activity improperly
- **Bribing a foreign public official** - This is where a person directly or through a third party offers, promises or gives any financial or other advantage to a foreign public official in an attempt to influence them.
- **Failing to prevent bribery** - A commercial organisation could be guilty of bribery where a person associated with the organisation, such as an employee, agent or even a sub-contractor, bribes another person intending to obtain or retain business for the organisation

The Bribery Act applies to all staff in the organisation. An organisation may be guilty of bribery even if only the individual offender knew of the bribery.

The Bribery Act introduces serious penalties such as unlimited fines for organisations and up to a maximum jail term of 10 years for the individuals involved.

Organisations will have a defence against prosecution if they can demonstrate that they had "adequate procedures in place to prevent bribery".

**Bribery is a serious criminal offence and the Trust does not and will not, pay bribes or offer improper inducement to anyone for any purpose. Equally the Trust does not and will not accept any bribes or improper inducements.**

It may be a disciplinary offence to engage in conduct or behaviour that does not comply with this policy or for anyone in a managerial or supervisory capacity to fail to act in respect of any such conduct or behaviour. This may be dealt with under the disciplinary procedure and could lead to dismissal without notice.

## 2. Definition of Bribery and Corruption

**Bribery** is an inducement or reward offered, promised or provided to gain personal,

commercial, regulatory or contractual advantage.

**Corruption** is a form of dishonesty or a criminal offense which is undertaken by a person or an organisation which is entrusted in a position of authority, in order to acquire illicit benefits or abuse power for one's personal gain.

### **3. Objective of the Anti-Bribery and Corruption Policy**

The objective of the policy is to provide a coherent and consistent approach to ensuring compliance with the Bribery Act. It will enable all employees and any person who performs services for and on behalf of the Trust (this could include contractors and subcontractors) to understand their responsibilities and allow them to take the necessary action, for example reporting any potential breaches of the policy.

The Trust is committed to countering bribery and corruption in all forms and will not tolerate it in any of its activities.

Ultimately the Trust CEO is responsible for the Anti-bribery and Corruption Policy; However the Trust requires that all staff and all working or performing any service on or on behalf of the Trust neither accept nor give bribes. Staff must:

- Act honestly with integrity at all times to safeguard the Trust's resources for which they are responsible
- Comply with the law (both in spirit and in the letter)
- Abide by this policy

### **4. Policy Details**

It is unacceptable to:

- Give, promise to give, or offer payment, gifts or hospitality with the expectation or hope that a favorable advantage will be received, or to reward a favorable advantage already given
- Give, promise to give, or offer payment, gifts or hospitality to a government official, agent or representative to "facilitate" or expedite a routine procedure
- Accept payment from a third party that is offered with the expectation that it will obtain a favorable advantage for them, whether known or suspected
- Accept a gift or hospitality from a third party if it is offered or provided with an expectation that a favorable advantage will be provided by the Academy in return, whether known or suspected
- Retaliate against or threaten a person who has refused to commit a bribery offence or who has raised concerns under this policy
- Engage in activity in breach of this policy

### **5. Related Policies**

The anti-bribery policy must be considered alongside the following policies which collectively set out the Trust's approach to reducing bribery risks:

- Gifts and Hospitality

- Counter-Fraud Policy
- Confidential Reporting
- Code of Conduct for staff
- Code of Conduct for Governors
- Contract Procedure Rules and Regulations and Procurement Regulations
- Recruitment and Disciplinary Policies and Procedures

## **6. Staff Responsibilities and all those working or performing any service on or behalf of the Trust**

Prevention, detection and reporting of bribery and other forms of corruption are the responsibility of all those working for the Academy Trust or under its control. All staff including third parties working or performing any service on or behalf of the Trust are to avoid activity that breaches this policy, and must:

- Ensure that they read, understand and comply with the policy
- Raise concerns as soon as possible if they suspect that this policy has been breached.

## **7. Adequate Procedures**

The procedures need to be applied proportionately based on the level of risk of bribery to the Academy. Adequate procedures cover:

- Risk Assessment  
That the Trust assesses the nature and extent of its exposure to potential bribery from inside and outside. The Trust should know who it is doing business with and whether this has risk implications.
- Top Level Commitment  
That the Academy Trust Directors are committed to preventing bribery. That there is a clear statement that bribery is not acceptable. That the anti-bribery policy is clearly communicated to all staff and partners of the Trust.
- Due Diligence  
That the Trust has policies in place and is aware of who it does business with. The Trust is confident that its business relationships are transparent and ethical.
- Clear, practical and accessible policies and procedures  
That the Trust's policies and procedures to prevent bribery being committed on its behalf are clear, practical, accessible and enforceable.
- Effective Implementation  
The anti-bribery policy and procedures are embedded throughout the Trust. This means that the anti-bribery statements are embedded in the recruitment, retention, and operational policies and in training programmes.
- Monitoring and Review  
That the Trust monitors and reviews its policies and procedures on a regular basis to ensure that there is compliance.

Ultimately, whether procedures are adequate is for the courts to decide on a case by case basis.

## **8. Reporting to the Police; Sanctions and Redress**

Staff who breach this policy face the possibility of civil and criminal prosecution. They also face disciplinary action, which could result in dismissal for gross misconduct.

The Headteacher and/or Chair of Governors and/or representative of the Academy Trust will decide whether any matter is referred to the police for further investigation and follow the reporting processes set out in the Trust's Disciplinary Policy.