 Beaumont School Anti-Bribery Policy (required by law)	Reviewed by Resources Committee – April 2025
	Next review – April 2028

## Introduction

The Bribery Act 2010 is designed to address bribery and corruption in the public and private sectors and applies to all UK businesses and charities.

The Act sets out four key offences

- Attempting to pay a bribe;
- Receiving a bribe;
- Bribing foreign officials;
- Failure to prevent bribery.

## What is Bribery?

Bribery is an inducement or reward offered, promised or provided to gain personal, commercial, regulatory or contractual advantage.

## Policy Objectives

It is the School's policy to conduct all of its business in an honest and ethical manner. We do not tolerate bribery or corruption in any form and our conduct in all our business dealings and transactions must be exemplary at all times. All staff and Trustees are required to comply with this policy.

The objective is to provide a coherent and consistent approach to ensuring compliance with the Bribery Act, enabling all employees and Trustees to understand their responsibilities and allowing them to take the necessary action, for example reporting any potential breaches of the policy.


## Scope of the Policy

The policy applies to all of the School's activities, including its work with strategic partners, third parties, suppliers, and others.

## Policy Details

It is unacceptable to:

- ◆ Give, promise to give, or offer payment, gifts or hospitality with the expectation or hope that a favourable advantage will be received, or to reward a favourable advantage already given;
- ◆ Give, promise to give, or offer payment, gifts or hospitality to a government

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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 favourable 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 favourable advantage will be provided by the school 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.

Please be aware that genuine and appropriate hospitality, gifts and reasonable promotional activities are not considered acts of bribery in themselves. Any gifts must be given or received in a genuine act of appreciation with no obligation attached. The Gifts and Hospitality Policy and Staff Professional Code of Conduct includes further guidance regarding the acceptance of gifts.

Staff and Trustees have a duty to:

- ◆ Raise concerns as soon as possible if they suspect that this policy has been breached.

### **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 Trustees, in consultation with appropriate professional advisers, will decide whether any matter is referred to the police for further investigation and follow the reporting processes set out in the School's Code of Conduct.

### **Related Policies and Documents**

The anti bribery policy must be considered alongside the following policies which collectively set out the school's approach to reducing risk in this area:

- ◆ Whistleblowing Policy
- ◆ Gifts and Hospitality Policy
- ◆ Staff Professional Code of Conduct
- ◆ Staff Disciplinary Procedures

**This policy has undergone an equality impact assessment in accordance with the school's Public Sector Equality Duty under the Equality Act 2010.**