



EVERYONE MATTERS
SCHOOLS TRUST

Anti-Corruption and Bribery Policy

Everyone Matters Schools Trust Central Policy



Policy Owner	CEO and Trustees
Scope of the Policy	Trust wide
Last reviewed by trustees	September 2025
Next review due	September 2028
Summary of key changes	No changes
Committee Responsible	Trustees

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1 SCOPE AND PURPOSE

- 1.1 It is the policy of The Everyone Matters Schools Trust to conduct all School business in an honest and ethical manner. The School's take a zero-tolerance approach to bribery and corruption and are committed to acting professionally, fairly and with integrity in all commercial dealings and relationships wherever it operates and implementing and enforcing effective systems to counter bribery.
- 1.2 The School's will uphold all laws relevant to countering bribery and corruption. However, it remains bound by the laws of the UK, including the Bribery Act 2010, in respect of conduct both at home and abroad.
- 1.3 The purpose of this policy is to:
- 1.3.1 set out the School's responsibilities, and of those working for it, in observing and upholding the School's position on bribery and corruption; and
 - 1.3.2 provide information and guidance to those working for the School on how to recognise and deal with bribery and corruption issues.
- 1.4 Bribery and corruption are punishable for individuals by up to ten years' imprisonment and if the School is found to have taken part in corruption it could face an unlimited fine, be excluded from tendering for public contracts and face damage to reputation. The Trust therefore takes its legal responsibilities very seriously.
- 1.5 In this policy, third party means any individual or organisation staff come into contact with during the course of their work for the Trust, and includes actual and potential clients, customers, suppliers, distributors, business contacts, agents, advisers, and government and public bodies, including their advisors, representatives and officials, politicians and political parties.

2 WHO IS RESPONSIBLE FOR THE POLICY?

- 2.1 The Trust has overall responsibility for the effective operation of this policy and for ensuring compliance with its legal and ethical obligations. The School has delegated day-to-day responsibility for operating the policy and ensuring its maintenance and review to the Principal/Headteacher.
- 2.2 The Principal/Headteacher is responsible for ensuring the fair application of this policy and ensuring that all members of staff are made aware of and understand this policy and are given adequate and regular training on it.

3 WHO IS COVERED BY THE POLICY?

This policy applies to all individuals working at all levels and grades, including officers, directors, trustees, governors, employees (whether permanent, fixed-term or temporary), consultants, contractors, trainees, seconded staff, homeworkers, casual workers and agency staff, volunteers, agents, sponsors, or any other person associated with the School's, or any of the School's subsidiaries or their employees, wherever located (collectively referred to as staff in this policy).

4 WHAT IS BRIBERY?

Bribery is offering, promising, giving or accepting any financial or other advantage, to induce the recipient or any other person to act improperly in the performance of their functions, or to reward them for acting improperly, or where the recipient would act improperly by accepting the advantage.

5 GIFTS AND HOSPITALITY

5.1 This policy does not prohibit reasonable and appropriate hospitality (given and received) to or from third parties.

5.2 The giving or receipt of gifts is not prohibited, if the following requirements are met:

5.2.1 it is not made with the intention of influencing a third party to obtain or retain business or a business advantage, or to reward the provision or retention of business or a business advantage, or in explicit or implicit exchange for favours or benefits;

5.2.2 it complies with any applicable local law;

5.2.3 it is given in the **School's** name, not in a member of staff's name;

5.2.4 it does not include cash or a cash equivalent (such as gift certificates or vouchers);

5.2.5 it is appropriate in the circumstances. For example, in the UK it is customary for small gifts to be given at Christmas time;

5.2.6 taking into account the reason for the gift, it is of an appropriate type and value and given at an appropriate time; and

5.2.7 it is given openly, not secretly.

5.3 The test to be applied is whether in all the circumstances the gift or hospitality is reasonable and justifiable. The intention behind the gift should always be considered.

6 WHAT IS NOT ACCEPTABLE?

It is not acceptable for a member of staff (or someone on his/her behalf) to:

6.1.1 give, promise to give, or offer, a payment, gift or hospitality with the expectation or hope that a commercial advantage will be received, or to reward a commercial advantage already given;

6.1.2 give, promise to give, offer or accept a payment, gift or hospitality during any commercial negotiations or tender process, if this could be perceived as intended or likely to influence the outcome.

6.1.3 accept a payment, gift or hospitality from a third party that a member of staff know or suspect is offered with the expectation that it will obtain a commercial advantage for them or anyone else in return;

6.1.4 accept hospitality from a third party that is unduly lavish or extravagant under the circumstances;

6.1.5 offered or accept a gift to or from government officials or representatives, or politicians or political parties, without the prior approval of the Principal/Headteacher.

6.1.6 threaten or retaliate against another individual who has refused to commit a bribery offence or who has raised concerns under this policy; or

6.1.7 engage in any other activity that might lead to a breach of this policy.

7 FACILITATION PAYMENTS AND KICKBACKS

7.1 The School's do not make, and will not accept, facilitation payments or 'kickbacks' of any kind.

7.2 Facilitation payments are typically small, unofficial payments made to secure or expedite a routine or necessary action (for example by a government official). They are not commonly paid in the UK, but are common in some other jurisdictions.

7.3 Kickbacks are typically payments made in return for a business favour or advantage.

7.4 Staff must avoid any activity that might lead to a facilitation payment or kickback being made or accepted by the School or on its behalf, or that might suggest that such a payment will be made or accepted. If staff are asked to make a payment on the School's behalf, staff should always be mindful of what the payment is for and whether the amount requested is proportionate to the goods or services provided. Staff should always ask for a receipt which details the reason for the payment. If staff have any suspicions, concerns or queries regarding a payment, they should raise these with the Principal/Headteacher.

8 DONATIONS

The/School's do not make contributions to political parties. It only makes charitable donations that are legal and ethical under local laws and practices. No donation must be offered or made without the prior approval of the Principal/Headteacher.

9 STAFF RESPONSIBILITIES

9.1 Staff must ensure that they read, understand and comply with this policy.

9.2 The prevention, detection and reporting of bribery and other forms of corruption are the responsibility of all those working for the School or under its control. Staff are required to avoid any activity that might lead to, or suggest, a breach of this policy.

9.3 Staff must notify the Principal/Headteacher as soon as possible if they believe or suspect that a conflict with this policy has occurred, or may occur in the future. For example, if an agent or potential agent offers staff something to gain a business advantage with us, or indicates to them that a gift or payment is required to secure their business. Further 'red flags' that may indicate bribery or corruption are set out in the Schedule to this policy.

10 RECORD-KEEPING

10.1 The School must keep financial records and have appropriate internal controls in place which will evidence the business reason for making payments to third parties.

10.2 Staff must declare and keep a written record of all hospitality or gifts accepted or offered, which will be subject to review. This register will exclude gifts from children/parents up to a value of £30

10.3 Staff must ensure all expenses claims relating to hospitality, gifts or expenses incurred to third parties are submitted in accordance with the School's Expenses Policy and specifically record the reason for the expenditure.

- 10.4 All accounts, invoices, memoranda and other documents and records relating to dealings with third parties, such as suppliers and business contacts, should be prepared and maintained with strict accuracy and completeness. No accounts must be kept 'off-book' to facilitate or conceal improper payments.

11 HOW TO RAISE A CONCERN

- 11.1 Staff are encouraged to raise concerns about any issue or suspicion of bribery or corruption at the earliest possible stage.
- 11.2 If Staff are offered a bribe, or are asked to make one, or if they believe or suspect that any bribery, corruption or other breach of this policy has occurred or may occur, they must report it in accordance with the School's Whistleblowing Policy as soon as possible. A copy of the School's Whistleblowing Policy can be found on the website and staff shared area.
- 11.3 If staff are unsure whether a particular act constitutes bribery or corruption, or if they have any other queries, these should be raised with the Principal/Headteacher.

12 PROTECTION

- 12.1 Individuals who refuse to accept or offer a bribe, or those who raise concerns or report another's wrongdoing, are sometimes worried about possible repercussions. The School aims to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken.
- 12.2 The School's are committed to ensuring no one suffers any detrimental treatment as a result of refusing to take part in bribery or corruption, or because of reporting in good faith their suspicion that an actual or potential bribery or other corruption offence has taken place, or may take place in the future. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If staff believe that they have suffered any such treatment, they should inform the Principal/Headteacher immediately. If the matter is not remedied, and the member of staff is an employee, they should raise it formally using the School's Grievance Policy, which can be found on the website and staff shared area.

13 TRAINING AND COMMUNICATION

- 13.1 Training on this policy forms part of the induction process for all new individuals who work for the School. All existing workers will receive regular, relevant training on how to implement and adhere to this policy.
- 13.2 The School's zero-tolerance approach to bribery and corruption must be communicated to all suppliers, contractors and business partners at the outset of any business relationship with them and as appropriate thereafter.

14 BREACHES OF THIS POLICY

- 14.1 Any employee who breaches this policy will face disciplinary action, which could result in dismissal for gross misconduct.
- 14.2 The School reserves the right to terminate its relationship with other individuals and organisations working on its behalf if they breach this policy.

