

**Truro and Penwith
Academy Trust**

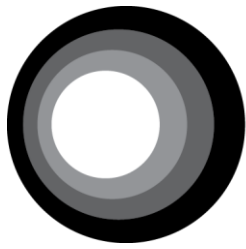
Anti-Bribery Policy

The following policy applies to all Truro & Penwith Academy Trust Schools:

Alverton Primary School
Berrycoombe Primary School
Blackwater C.P. School
Bodriggy Academy
Cape Cornwall School
Cardinham School
Chacewater Primary School
Gulval School
Hayle Academy
Kehelland Village School
Kennall Vale School
Lanivet Community Primary School
Liskeard Hillfort School
Mithian School
Mousehole Primary School

Nancledra School
Newlyn School
Pendeen School
Pensans C.P. School
Perranporth C.P. School
Roche C.P. School
Sennen Primary School
St Dennis Primary Academy
St Erth School
St Ives School
St Just Primary School
Threemilestone School
Tywardreath School
Trewirgie Infants School

DATE APPROVED BY TPAT Board of Trustees: October 2021



Truro and Penwith **Academy Trust**

Anti-Bribery Policy Statement

Introduction

The Trust has a zero-tolerance for bribery and corruption. The Trust's reputation with the community it serves and other stakeholders is underpinned by ethical behaviour, financial probity and honesty. The Trust aims to limit its exposure to bribery by:

- setting out a clear anti-bribery policy, which is proportionate to the risks that the Trust is exposed to;
- embedding awareness and understanding of the Trust's anti-bribery policy amongst all staff, "associated persons" (any person performing services for or on behalf of the Trust), and external persons/organisations with whom the Trust has commercial relations;
- training staff as appropriate so that they can recognise and avoid the use of bribery by themselves and others;
- encouraging staff to be vigilant and to report any suspicion of bribery, providing them with suitable channels of and ensuring sensitive information is treated appropriately;
- rigorously investigating instances of alleged bribery in accordance with the Trust's whistleblowing, disciplinary and other procedures; and assisting the Police and other appropriate authorities in any resultant prosecution;
- taking firm and vigorous action against any individual(s) involved in bribery.

The Policy

This policy applies to all employees and anyone acting for, or on behalf of, the Trust ("associated persons"), including directors, governors, other volunteers, temporary workers, consultants and contractors.

All employees and associated persons are responsible for maintaining the highest standards of business conduct and are expected to behave honestly and with integrity. Any breach of this policy will constitute a serious disciplinary offence, which may lead to dismissal and may become a criminal matter for the individual.

The Trust prohibits employees and associated persons from offering, giving, soliciting or accepting any bribe. The bribe might include cash, a gift or other inducement, to or from any person or organisation, wherever they are situated, and irrespective of whether or not they are a public official/body or private person or company, by any individual director, governor, employee, agent or other person or body acting on the Trust's behalf. The bribe might be made in order to:

- gain any commercial, contractual or regulatory advantage for the Trust in a way which is unethical;
- gain any personal advantage, pecuniary, or otherwise, for the individual or anyone connected with the individual.

This policy is not intended to prohibit appropriate corporate entertainment and/or hospitality undertaken in connection with the Trust's business activities, provided the activity is customary under the circumstances, is proportionate, and is properly recorded/disclosed to the Trust in accordance with its *Fraud and Corruption Policy* and *Declaration of Gifts and Hospitality Policy*.

Employees and associated persons are requested to remain vigilant in preventing, detecting and reporting bribery. Employees and associated persons are expected to report any concerns regarding any suspected bribery to the Director of Business and Finance immediately.