Charlton Park Academy
Anti-Bribery and Corruption Policy

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1. Policy Overview

Charlton Park Academy is committed to operating fairly, honestly and with integrity. As part of this overall commitment, the Trust has a zero-tolerance policy in relation to bribery and corruption. This includes a commitment to comply with all applicable anti-bribery and corruption laws and regulations and, in particular, the Bribery Act 2010.

Compliance with the law helps to maintain and enhance our good reputation and reflects our goal to serve the best interests of our pupils. Compliance also protects the Trust, its employees and anyone else associated with it from the severe consequences of breaking the law. Penalties in the UK include unlimited fines in the case of CPA and unlimited personal fines and up to ten years' imprisonment in the case of individuals.

UK bribery laws are extensive and prohibit the giving or receiving of bribes. A bribe is designed to improperly influence the way in which a person acts and may be in the form of money but can also be any other type of advantage. For example, the law extends to the giving or receipt of inappropriate entertainment and to "grease" payments to public officials (e.g. payments to expedite a process).

Remember that the law can be complex, and it will not always be clear how the law applies in every situation. Therefore, any questions or concerns about the application of the law to specific situations should be directed to the Principal. To ensure compliance with the law, you should ensure also that you follow our policies and procedures in relation to gifts and entertainment and claiming expenses.

We require all employees and anyone else associated with the Academy to follow this policy and to comply with all applicable anti-bribery and corruption laws. It is the responsibility of all of us to make sure that we uphold our values and that all of our dealings are legitimate.

It is 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 will be dealt with under the disciplinary procedure and could lead to dismissal without notice.

If you believe that anyone associated with the company is acting in a way that may contravene the law or that could put the company at risk then it is your duty to report the matter as soon as possible. If you are uncomfortable talking to your supervisor or your supervisor's manager or you do not receive a satisfactory response, then you should contact the Principal or the Chair of Governors. This policy operates alongside CPA's Whistleblowing Policy** and Fraud Policy and Response Plan.

2. Policy Definitions

Bribery

The Bribery Act 2010 introduces four offences:

- **The offence of 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.
- **The offence of being bribed.** This is where a person receives or accepts a financial

or other advantage to perform a function or activity improperly.

- **Bribery of 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.
- **A corporate offence of failure 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.

Corruption
The offering, giving, soliciting or acceptance of an inducement or reward that may influence the actions of any person. Both parties are equally guilty of an offence.

3. Gifts and Entertainment

Anyone associated with the Trust must adhere to the rules and guidance in this policy when giving or receiving gifts or entertainment.

In no circumstances should anyone associated with the Trust offer, give or accept any gift or hospitality which might be construed as an attempt to influence a business decision (e.g. hospitality or a gift during a tender process).

If you are ever uncertain as to the correct course of action, please speak in confidence to the Principal or the Chair of Governors.

3.1 Gifts

Giving of Gifts
In general, the Trust does not believe that the giving of gifts is appropriate. Staff must never give a gift on behalf of the Trust without the express permission of the Principal or the Chair of Governors. If staff seek permission to give a gift, they must be prepared to explain the reason for which the gift is being given and why the gift is appropriate.

- For clarity, the following represent allowable costs that can be incurred by the Academy and are therefore not captured by the above restriction on 'gifts', provided they demonstrate propriety, regularity, and value for money in the use of public funds as mandated by the Academy Trust Handbook (ATH):
- Purchase of flowers, the giving or a charitable donation, or similar, either to academy staff or an appropriate external party, as a one-off gesture to recognise circumstances such as, illness or as a 'thank you'.
- Purchase of food, drink and other related items for staff and external individuals where necessary as part of special events – for example parents' evenings, Academy-organised sports events.

Such gestures as described above are allowable when appropriate, not excessive, and approved by the Principal or the Chair of Governors.

For clarity, the use of academy funds is strictly prohibited in the following circumstances:

- As a gift for life-events such as resignation, retirement or maternity, although staff may choose to purchase a gift by collecting their own personal funds.
- For the purchase of alcohol.

Receipt of Gifts
Gifts in this context include physical goods, digital assets, and services. In general, you are required to return any commercial gift or donate it to charity, sending a polite letter explaining that the Trust's policy is not to accept corporate gifts.

However, CPA recognises it is common accepted practice for academy staff to accept low value gifts from pupils or parents, for example at the end of term.

- Staff Threshold: Gifts of this nature do not need to be recorded on the Register of Gifts and Hospitality, so long as the gift is less than £30 in value and could not be perceived as being given to exert undue influence on the staff member.
- Trustee/Governor Threshold: In alignment with the *CPA Governing Body Code of Conduct*, Trustees and Governors must declare all gifts and hospitality worth more than £30.00 to be recorded in the Register of Interest.

For clarity, the following are not considered to be gifts under the definitions of this policy and can therefore be accepted so long as they cannot be construed as an attempt to influence a business decision:

- Items provided for use by academy staff in the performance of their role at the Academy, which would otherwise need to be purchased. Examples include low-value stationery items such as pens or calendars.
- Standard business-to-consumer special offers and corporate discounts available broadly to all education workers.
- Gifts provided directly for pupils at the Academy, so long as the procurement decision does not take account of the donation of the gift. Examples include textbooks, sports equipment, or other donations used openly by the academy to reward students.

Under no circumstances can gifts of cash, or cash equivalents (including retail vouchers, gift cards, and tokens), be accepted by any individual.

3.2 Grease Payments / "Kickbacks"
Grease payments or "kickbacks" to public officials in order to gain or speed up actions by them must not be made. These are illegal and any demand for them must be reported to the Principal or the Chair of Governors.

3.3 Hospitality / Entertainment
The provision and receipt of reasonable hospitality related to the business activities of the Trust is allowed provided that the procedures set out in this policy are adhered to. However, the giving or receiving of hospitality/entertainment on behalf of the Trust should always be kept within reasonable limits.

The Academy will not give or accept hospitality that could compromise, or be perceived to compromise, the independence of operational or procurement decisions. A complete log of all declined invitations or returned gifts must be

maintained alongside accepted entries to demonstrate transparent institutional integrity.

If you are offered hospitality of any value as a consequence of your role within the Trust:

- If you are an SLT member, you must disclose the hospitality and its nature to the Principal or the Chair of the Governing Body, and obtain written approval before accepting, using the form attached in Appendix I.
- If you are an Academy staff member, you must disclose the item to the Principal and obtain written approval before accepting, using the form attached in Appendix I.

In addition, if any hospitality/entertainment is likely to exceed £50, its provision or receipt must be authorised by the Principal or the Chair of the Governing Body in advance. Factors taken into account include the proportionality of the event, whether a procurement or tender process is underway or upcoming, and the intended purpose of the event. It is acceptable to receive proportionate hospitality if the sole purpose is to maintain effective, standard professional working relationships.

Staff involved in active procurement or tender exercises must never accept any level of hospitality from prospective bidders, regardless of value. If you do not obtain the appropriate advance authorization required by this section, you will not be reimbursed for any related expenses, and may face disciplinary action.

Any hospitality or entertainment offered—whether accepted or declined—must be formally declared and submitted to the Chief Financial Officer (CFO) to be recorded in the master Academy Register of Gifts and Hospitality, which is subject to regular review by the Audit Committee.

Appendix I

Declaration of Gifts/Hospitality (Offered or Received)

Please complete the form below which should be signed in line with the Scheme of Delegation and returned to the Chief Finance Officer.

This declaration will be retained and recorded in The Register of Gifts and Hospitality.

Name:	**Class/Department:**

Date of Offer of Gift/Hospitality:	**Estimated value:**
Individual/Organisation making offer of Gift/Hospitality:	
Details:	
Reason for Gift/Hospitality:	
Gift/Hospitality Accepted: Yes/No	

Signature (Employee): _____

Authorising Signature and Position: _____
(See below)

Hospitality Staff – Principal
SLT – Principal/Chair of Governors
Principal - Chair of Governors

Gifts
As per the Anti-Bribery and Corruption Policy, you are not required to record gifts from parents or pupils which are below £30. These are the only gifts that can be accepted as per the terms of the Policy.