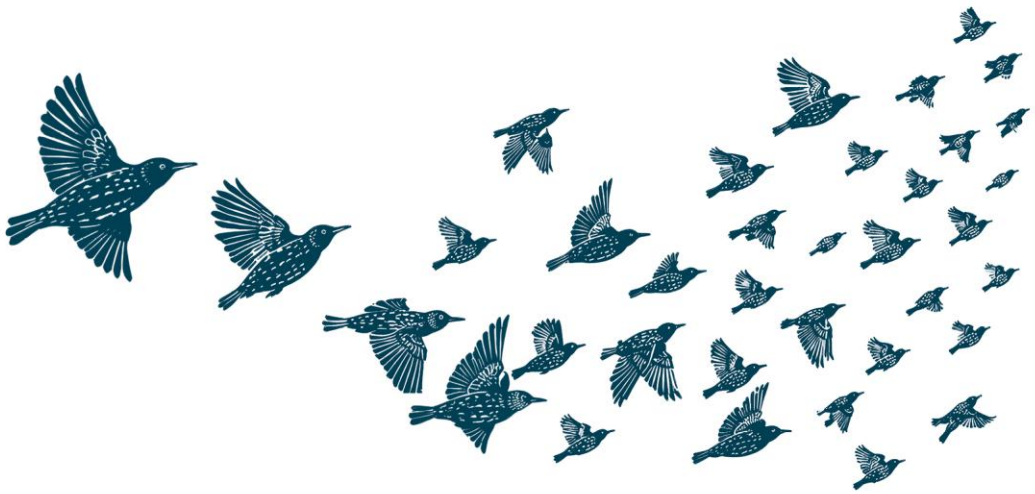
TPAT
Truro and Penwith Academy Trust

Anti-Bribery Policy

Review Summary

Approved By:	**Trustees**
Approval Date:	**September 2026**
Next Review Date:	**September 2029**



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 governance individuals, 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 undertaking a governance role, 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 Anti-Fraud and Corruption Policy and Gifts and Hospitality Policy.

Employees and associated persons are requested to remain vigilant in preventing, detecting and reporting bribery. Employees and associated persons must report any suspected bribery without delay through the reporting routes in the Trust's Anti-Fraud and Corruption Policy. Concerns may also be raised under the Trust's Whistleblowing Policy.