

ANTI BRIBERY POLICY

Introduction

The Bribery Act 2010 came into force on 1st July 2011 and introduced an offence for organisations of 'failing to prevent bribery'. Under the Act organisations need to have in place adequate procedures to prevent bribery occurring if they are to avail themselves of the "adequate procedures" defence.

Policy Statement

ALT values its reputation for ethical behaviour and for financial probity and reliability. It recognises that over and above the commission of any crime, any involvement in bribery will also reflect adversely on its image and reputation. Its aim therefore is to limit ALT's exposure to bribery by:

- Setting out a clear anti-bribery policy;
- Encouraging its staff to be vigilant and to report any suspicions of bribery, providing them with suitable channels of communication and ensuring sensitive information is treated appropriately;
- Rigorously investigating instances of alleged bribery and assisting police and other appropriate authorities in any resultant prosecution;
- Taking firm and vigorous action against any individual(s) involved in bribery.

Scope

This Policy applies to Trustees, Governors, co-opted members of committees, and all staff who work for ALT.

ALT prohibits the offering, the giving, the solicitation or the acceptance of any bribe, whether cash or other inducement **to or from** any person or company, wherever they are situated, whether they are a public official or body or private person or company **by** any individual employee acting on ALT's behalf **in order to** gain any commercial, contractual or regulatory advantage for ALT in a way which is unethical, **or in order to** gain any personal advantage, pecuniary or otherwise, for the individual or anyone connected with the individual.

Further Clarification

ALT recognises that market practice varies across the areas in which it does business and what is normal and acceptable in one place may not be in another. This policy prohibits any inducement which results in a personal gain or advantage to the recipient or any person or body associated with them.

This policy is not meant to prohibit the following practices providing they are customary in a particular market, are proportionate and are properly recorded:

- Normal and appropriate hospitality (further guidance is given in ALT's Gifts and Hospitality Policy)

- The giving of a ceremonial gift on a festival or another special time
- The use of any recognised fast-track process which is available to all on payment of a fee
- The offer of resources to assist the person or body to make the decision more efficiently provided that they are supplied for that purpose only.

The ALT's Financial Manual gives details of the actions to be taken where a person perceives fraudulent or corrupt acts are being perpetrated.

Inevitably, decisions as to what is acceptable may not always be easy. If anyone is in doubt as to whether a potential act constitutes bribery, the matter should be referred to their line manager. If necessary, guidance should also be sought from either the Headteacher or Assistant Headteacher.

Staff, Trustee and Governor Responsibility

The prevention, detection and reporting of bribery is the responsibility of all staff, Trustees and Governors throughout ALT.

6. Related Strategies and Policies

The following other strategies and policies have been developed to demonstrate to all that ALT will not tolerate any party who it either employs or works with entering into fraudulent or corrupt acts that would damage its reputation of financial standing:

- Anti-Fraud Policy and Fraud Response Plan
- Internal Financial Handbook
- Risk Management Policy and Procedures.

Review of this policy

The ALT Board of Trustees through its Finance Committee review this policy every three years. It may however review this policy earlier than this if the government produces new regulations, or if it receives recommendations on how this policy might be improved.

Approved by Finance Committee of the Board of Trustees of ALT on 11 July 2017.

Signed: (Chair of Trustees)

Signed : (Chief Executive Officer)

Date for Review: July 2020