St Cyprian's Greek Orthodox Primary Academy

ΠΑΝΤΑ ΙΣΧΥΩ ΕΝ ΤΩ ΕΝΔΥΝΑΜΟΥΝΤΙ ΜΕ ΧΡΙΣΤΩ ΙΝΑ ΑΡΙΣΤΕΥΩ

I AM STRONG THROUGH JESUS CHRIST

TO THE BEST THAT I CAN BE

Anti-Corruption & Bribery Policy

Revised: July 2026

Reviewed and ratified by Full academy Trust:

Date: 16.7.26

Signed: A. Christou

Name: ARETI CHRISTOU

Position: Chair of Academy Trust

Date of next review: July 2027

Mission Statement

The aim of St. Cyprian's Greek Orthodox Primary Academy is to provide its children with primary education of the highest quality in a supportive learning environment through the National Curriculum in the core subjects, enriched by the progressive teaching of the Greek language and Christian Orthodox religion.
The children will be equipped with the knowledge, skills and spirituality to enable them to achieve their full potential and prepare them for transition to secondary education and to contribute positively to the challenges of a diverse multicultural society.

The term 'parents' in this policy also refers to carers.

Introduction

It is the policy of St Cyprian's Greek Orthodox Academy ('the School') to conduct all of its business in and honest and ethical manner. We take a zero-tolerance approach to bribery and corruption and are committed to acting professionally, fairly and with integrity in all our business dealings and relationships wherever we operate, and implementing and enforcing effective systems to counter bribery.

The School will comply with the Bribery Act 2010.

Bribery and corruption are punishable for individuals by up to ten years' imprisonment and if we are found to have taken part in corruption, the School could face an unlimited fine and damage to its reputation. We therefore take our legal responsibilities very seriously.

Under the Bribery Act, one of the offences ***'Failure to prevent Bribery'*** is a reverse burden of proof offence, i.e. in order to claim a defence against the offence, there is a need to prove that there were adequate procedures in place to prevent bribery from taking place.

The purpose of this policy is to:

1. Set out the responsibilities of our School and of those working for us, in observing and upholding our position on bribery and corruption; and
2. Provide information and guidance to those working for us on how to recognise and deal with bribery and corruption issues.

In this policy **'third party'** refers to any individual or organisation that staff employed come into contact with during the course of their work for the School, and includes actual and prospective pupils and parents, suppliers, business contacts, agents, advisers, and government and public bodies.

This policy applies to all individuals working for the School, whether permanent, fixed term, temporary and includes governors, volunteers, agents or any other person associated with the School. These individuals are all referred to as **'staff'.**

In accordance with best practice, we will require all staff to complete a declaration of interest form whether or not they have anything to declare.

What is bribery?

Bribery is an inducement or reward offered, promised or provided in order to gain any business or personal advantage.

Gifts and Hospitality

This policy does not prohibit normal and appropriate hospitality (given and received) to or from third parties, as long as the following requirements are met:

- 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
- It is given in the name of the School
- It does not contain cash (or a cash equivalent, such as gift certificates or vouchers)
- It is appropriate in the circumstances (e.g. it is customary in the UK to give small gifts at Christmas time)
- The gift is of an appropriate type and value and given at an appropriate time
- It is given openly, not secretly

It is not acceptable for staff to:

- Give, promise to give, or offer, a payment, gift or hospitality with the expectation or hope that an advantage will be received for the School, or to reward an advantage already given
- Accept payment from a third party that they know or suspect is offered with the expectation that it will obtain an advantage for them
- Accept a gift or hospitality from a third party if they know or suspect that it is offered or provided with an expectation that a business advantage will be provided by the School in return
- Threaten to retaliate against another member of staff who has refused to commit a bribery offence or who has raised concerns under this policy

Donations

Accepting donations: When accepting donations, the School must be clear that the donations are not tied to any advantage of the donor.

Making donations: the School only makes charitable donations that are legal and ethical under local laws and practices. No donation must be offered or made in the name of the School without the prior approval of the Headteacher or Business Manager.

Staff Responsibilities

Staff must read, understand and comply with this policy.

The prevention, detection and reporting of bribery and other forms of corruption are the responsibility of all those working for or on behalf of the School. All staff are required to avoid any activity that might lead to, or suggest, a breach of this policy.

All staff must notify the Headteacher as soon as possible if he/she believes or suspects that a breach of this policy has occurred, or may occur in the future.

Any employee who breaches this policy will face disciplinary action, which could result in dismissal for gross misconduct. We reserve our right to terminate any contractual relationship with other parties if they breach this policy.

Record-keeping

The School keeps financial records and has appropriate internal controls in place which will evidence the business reason for making payments to third parties.

All staff must make the Business Manager aware of any hospitality or gifts offered or accepted above an equivalent monetary value of £20. This includes 'free' training days. A written record of these will be retained for periodic review by the Finance committee.

Staff must ensure that all expenses claims relating to hospitality, gifts or expenses incurred to third parties are submitted in accordance with the school's expenses/petty cash procedures.

All accounts, invoices, and other documents and records relating to dealings with third parties (e.g. suppliers and business contacts) must be prepared and maintained with strict accuracy and completeness.

When awarding contracts, details of the decision-making process should be retained to provide evidence that bribery has not taken place.

How to raise a concern

Workers are encouraged to raise concerns about any issue or suspicion of malpractice at the earliest possible stage. Concerns should be reported by following the procedure set out in the school' Whistleblowing policy.

Related policies and procedures

Whistleblowing policy

Anti-fraud & Corruption policy