NORTHAMPTON SCHOOL FOR GIRLS

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Anti-Bribery and Corruption Policy

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Version	Date	Updates
V2	**September 2025**	Changes highlighted in yellow.
V3	**September 2026**	Updates to reflect current ATH and other changes, highlighted in yellow.

Associated Policies	• Whistleblowing • Professional and Safe Conduct • Procurement Policy

1.	Policy Statement
1.1	Northampton School for Girls (NSG) is committed to operating fairly, honestly and with integrity. As part of this overall commitment, Northampton School for Girls 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, and with the requirements of the current Academy Handbook.
1.2	Bribery is a criminal offence for both individuals and commercial organisations and can be punished with imprisonment of up to 10 years or unlimited fines. If any employee was accused of bribery, the Academy's reputation may be damaged considerably and subsequent enforcement action will be time-consuming and hinder NSG from focusing on its core business delivery.
1.3	This policy sets out NSG's arrangements for preventing, identifying and responding to bribery and corruption. It explains the standards expected of trustees, employees and persons associated with NSG and the arrangements for reporting actual or suspected bribery and corruption.
2.	**Who does this policy apply to?**
2.1	This policy requires all staff, trustees and anyone else associated with NSG (for example, consultants, vendors, contractors and any other parties who have a business relationship with NSG) to follow this policy and to comply with all applicable anti-bribery and corruption laws. It will be brought to the attention of all employees and form part of the induction process for new staff.
2.2	Everyone to whom this policy applies is responsible for acting honestly, with integrity and in accordance with the law and NSG's policies and procedures. No person must use their position or relationship with NSG to obtain an improper advantage for themselves or another person.
2.3	NSG requires that all staff and everyone working or performing any service on or on behalf of the school neither accept nor give bribes. Staff must: • Act honestly with integrity at all times to safeguard NSG's resources for which they are responsible. • Comply with the law (both in spirit and to the letter). • Abide by this policy.
3.	**Who is responsible for carrying out this policy?**
3.1	The Board of Trustees has overall responsibility and implementation of this policy will be monitored by the Senior Leadership Team. The Finance, Risk & Audit Committee will provide oversight.
3.2	In implementing this policy, managers must ensure that all staff are treated fairly and within the provisions and spirit of NSG's Equality Policy.
3.3	See paragraph 10 for a summary of the roles and responsibilities for carrying out this policy.
4.	**What are the principles behind the policy?**
4.1	This policy relates to all forms of bribery and is intended to provide direction to trustees, employees and other persons who may identify suspected bribery. The overall aims of the policy are to: • Improve the knowledge and understanding of everyone at NSG about the risk of bribery within the organisation and its unacceptability • Assist in promoting a climate of openness and a culture and environment where staff feel able to raise concerns sensibly and responsibly • Set out NSG's responsibilities in terms of the deterrence, prevention, detection and investigation of bribery and corruption • Ensure appropriate sanctions are considered following an investigation, including: criminal prosecution; civil proceedings, disciplinary action (including professional/regulatory bodies).
4.2	Compliance with the law helps to maintain and enhance NSG's reputation and reflects our goal to serve the best interests of our pupils.

4.3	Compliance protects NSG, its staff 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 NSG and unlimited personal fines and up to ten years' imprisonment in the case of individuals.
4.4	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 take action in respect of any such conduct or behaviour. This will be dealt with under NSG's applicable disciplinary procedure and could lead to dismissal without notice.
5.	**Procedures (standards)**
5.1	Under the Bribery Act 2010, a bribe is a financial or other type of advantage that is offered or requested with the: • Intention of inducing or rewarding improper performance of a function or activity (this includes public, state or business activities or any activity performed in the course of a person's employment, or on behalf of another organisation or individual, where the person performing that activity is expected to perform it in good faith, impartially, or in accordance with a position of trust); or • Knowledge or belief that accepting such a reward would constitute the improper performance of such a function or activity.
5.2	The Bribery Act 2010 contains four principal bribery offences: • offering, promising or giving a bribe; • requesting, agreeing to receive or accepting a bribe; • bribing a foreign public official; and • failure by a relevant commercial organisation to prevent bribery by a person associated with it. NSG maintains proportionate procedures designed to prevent bribery and corruption by its employees and persons performing services on its behalf. For the avoidance of doubt, it is unacceptable to: • Give, promise to give, or offer payment, gifts or hospitality with the expectation or hope that a favourable advantage will be received, or to reward a favourable advantage already given. • Give, promise to give, or offer payment, gifts or hospitality to a government official, agent or representative to "facilitate" or expedite a routine procedure. • Accept payment from a third party that is offered with the expectation that it will obtain a favourable advantage for them, whether known or suspected. • Accept a gift or hospitality from a third party if it is offered or provided with an expectation that a favourable advantage will be provided by NSG in return, whether known or suspected. • Retaliate against or threaten a person who has refused to commit a bribery offence or who has raised concerns under this policy. • Engage in any activity which may breach this policy. • Offer, give, request or receive any kickback or other improper payment or benefit.
5.3	All staff are required to take particular care to ensure that all NSG records are accurately maintained in relation to any contracts or business activities, including financial invoices and all payment transactions with clients, suppliers and public officials. All gifts, payments or any other contribution made under the Anti-Bribery and Corruption Policy and these guidelines, whether in cash or kind, shall be documented, regularly reviewed, and properly accounted for in NSG's accounts.
5.4	Due diligence should be undertaken by staff prior to entering into any contract, arrangement or relationship with a potential supplier of services, agent, consultant or representative.
5.5	NSG procures goods and services ethically and transparently with the quality, price and value for money determining the successful supplier/contractor, not by receiving (or offering) improper benefits. NSG will not engage in any form of bribery. NSG and all employees shall at all times comply with the Bribery Act 2010 and with this policy.
5.6	NSG may be held responsible, in certain circumstances, for acts of bribery committed by intermediaries acting on its behalf such as subsidiaries, clients, business partners, contractors, suppliers, agents,

	advisors, consultants or other third parties. The use of intermediaries for the purpose of committing acts of bribery is prohibited.
5.7	All intermediaries shall be selected with care, and all agreements with intermediaries shall be concluded under terms that are in line with this policy. NSG will contractually require its agents to comply with the Anti-Bribery Policy and to keep proper records available for inspection by NSG, auditors or investigating authorities. NSG will monitor performance and, in case of non-compliance, require the correction of deficiencies, apply sanctions, or eventually terminate the agreement.
5.8	All employees will not request or receive a bribe from anybody, nor imply that such an act might be considered. This means that you will not agree to receive or accept a financial or other advantage from a former, current or future client, business partner or contractor or supplier as an incentive or reward to perform improperly your function or activities.
5.9	NSG has procedures in place that reduce the likelihood of bribery occurring. These include the Academy Trust Handbook, documented procedures, a system of internal control (including internal and external audit) and a system of risk assessment.
6.	**Raising Concerns**
6.1	NSG wishes to encourage anyone having reasonable suspicions of bribery to report them. If you believe that anyone associated with NSG is acting in a way that may contravene the law or that could put NSG at risk, then it is your duty to report the matter as soon as possible. If you are uncomfortable talking to your line manager or the Headteacher or you do not receive a satisfactory response then you should contact the School Business Manager.
6.2	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 School Business Manager. In order 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.
6.3	No individual will suffer any detrimental treatment as a result of reporting reasonably held suspicions. However, any unfounded or malicious allegations will be subject to a full investigation and appropriate disciplinary action.
7.	**Corporate entertainment, gifts, hospitality and promotional expenditure procedures**
7.1	Gifts, hospitality, awards, prizes or other benefits must never be offered, promised, given, requested or accepted where their purpose, or apparent purpose, is to influence a decision improperly, secure an improper advantage or compromise an individual's judgement or integrity.
7.2	Reasonable and proportionate gifts or hospitality may be offered or accepted where there is a legitimate purpose, they are appropriate in the circumstances and they could not reasonably be perceived as influencing an individual's impartiality.
7.3	Particular caution must be exercised where gifts or hospitality are offered by existing or prospective suppliers, contractors or other organisations seeking to do business with NSG. Gifts or hospitality must not be accepted where a procurement, tendering, contracting or other material decision involving the provider is pending.
7.4	Any expenditure by NSG on gifts or hospitality must be reasonable, appropriately authorised within the Scheme of Delegation, properly documented and consistent with the principles of propriety, regularity and value for money.
7.5	Any gifts, rewards or entertainment received or offered from parents/carers, clients, public officials, suppliers or other business contacts should be reported immediately to the School Business Manager through the Gifts & Hospitality Declaration Form ~~or Headteacher~~. In the case of the Headteacher being offered or receiving any gift, rewards or entertainment from parents/carers, clients, public officials, suppliers or other business contacts then this should be reported immediately to the School Business Manager. In certain circumstances, it may not be appropriate to retain such gifts or be provided with the entertainment and employees and associated persons may be asked to return the gifts to the sender or refuse the

	entertainment, for example, where there could be a real or perceived conflict of interest or where the value exceeds £100. As a general rule, small tokens of appreciation, such as flowers or a bottle of wine, may be retained by staff, if the value does not exceed ~~£10~~ £20. Staff (including the Headteacher) should notify the School Business Manager of any gift or hospitality over this value for entry in the Register of Business Interests.
7.6	If a member of staff wishes to provide gifts to suppliers, clients or other business contacts, prior written approval from the School Business Manager or Headteacher is required, together with details of the intended recipients, reasons for the gift and business objective.
8.	**Related Party Transactions**
8.1	NSG will abide by the provisions as set out in the current DfE Academy Trust Handbook on all matters related to related party transactions.
8.2	A related party transaction is defined as 'where one party has control or influence over the other, or where the parties are subject to common control.' Related parties include: • parties with control over, or controlled by, the entity (for example parent and subsidiary companies) • parties having significant influence over the entity • key management personnel of the entity, including any director, whether executive or otherwise • close family members of any of the above • others subject to control or significant influence by any individual referred to above Such transactions are permitted under company law, charity law and under the ESFA Academy Trust Handbook, provided that open and transparent procurement procedures have been followed, and any potential conflicts of interest are adequately and appropriately managed.
8.3	NSG will manage related-party relationships and transactions transparently and in accordance with the Academy Trust Handbook. In particular: • members, trustees and senior employees must complete and keep up to date the Trust's Register of Interests; • trustees must comply with their statutory duties concerning conflicts of interest, benefits from third parties and declarations of interest; • no member, trustee, employee or related individual or organisation may use their connection with NSG for personal gain; • related-party transactions must be subject to open, fair and transparent procurement arrangements; • sufficient records must be retained to demonstrate compliance and appropriate disclosures made in NSG's annual accounts; • all contracts and other agreements with related parties must be reported to DfE in advance of commencement or renewal where required by the Academy Trust Handbook; • DfE's prior approval must be obtained for contracts or agreements requiring approval under the Academy Trust Handbook; and • novel, contentious or repercussive related-party transactions must receive DfE approval in advance regardless of value.
9.4	NSG will apply the reporting, approval and financial thresholds contained in the current Academy Trust Handbook and associated DfE guidance. Where a threshold or requirement changes, the current Academy Trust Handbook will take precedence over any threshold previously contained in this policy.
9.	**At Cost Requirements**
9.1	NSG is committed to ensuring that it pays no more than 'cost' for goods or services provided to it by the following parties ('services' do not include services provided under a contract of employment): • Any member or trustee of NSG. • Any individual/organisation connected to a member or trustee of NSG, such as: ○ Close family members

	○ Individuals/organisations in business partnership with the member or trustee, or a relative of the member or trustee ○ A company in which a member or trustee, or the relative of a member or trustee, holds more than 20% of the share capital or is entitled to exercise more than 20% of the voting power at any general meeting of that company ○ An organisation which is controlled by a member or trustee, or the relative of a member or trustee • Any individual/organisation that's given the right under NSG's articles of association to appoint a member or trustee of NSG; or anybody connected to such individual/organisation (i.e. controls, is controlled by or is under common control with the individual/organisation) • Any individual/organisation recognised by the secretary of state as a sponsor of NSG; or anybody connected to such an individual/organisation
9.2	NSG will ensure that any agreement with an individual or organisation referred to in section to supply goods or services to NSG is properly procured through an open and fair process and is: • Supported by a statement of assurance from that individual or organisation to NSG confirming their charges do not exceed the cost of the goods or services, and • On the basis of an open book agreement including a requirement for the supplier to demonstrate clearly, if requested, that their charges do not exceed the cost of supply.
10.	**Roles and responsibilities**
Board of Trustees	
10.1	The Board has a duty to ensure that it provides a secure environment in which to work, and one where people are confident to raise concerns without worrying that it will reflect badly on them. This extends to ensuring that staff feel protected when carrying out their official duties and are not placed in a vulnerable position. If staff have concerns about any procedures or processes that they are asked to be involved in, NSG has a duty to ensure that those concerns are listened to and addressed.
10.2	NSG therefore has a duty to ensure employees receive adequate training and support in order to carry out their responsibilities.
Employees	
10.3	Members, Trustees and staff at all levels will lead by example in acting with the utmost integrity and ensuring adherence to all relevant regulations, policies and procedures.
10.4	Employees must act in accordance with NSG's Gifts and Hospitality and Declaration of Interest Policies which include guidance on the receipt of gifts or hospitality.
10.5	Employees who are involved in receiving offers of sponsorship, funding or gifts from outside agencies also should comply with their own professional codes of practice. Professional staff must also make themselves aware of their own professional body codes of conduct.
10.6	All employees responsible for authorising orders are to report all transactions with related parties to the School Business Manager who will notify the DfE in advance of the transaction taking place.
Managers	
10.7	Line managers at all levels have a responsibility to ensure that an adequate system of internal control exists within their areas of responsibility and that controls operate effectively. The responsibility for the prevention and detection of bribery therefore primarily rests with managers but requires the cooperation of all employees.
10.8	As part of that responsibility, line managers need to: • Inform staff of NSG's code of gifts and hospitality, declaration of interest and counter fraud and Anti-Bribery policies as part of their induction process, paying particular attention to the need for accurate completion of personal records and forms; • ensure that all employees for whom they are accountable are made aware of the requirements of the policy; • assess the types of risk involved in the operations for which they are responsible;

	• ensure that adequate control measures are put in place to minimise the risks. This must include clear roles and responsibilities, supervisory checks, staff rotation (particularly in key posts), separation of duties wherever possible so that control of a key function is not invested in one individual, and regular reviews, reconciliations and test checks to ensure that control measures continue to operate effectively; • be aware of NSG's Anti-Bribery Policy; • identify sensitive / at-risk posts; • ensure that controls are being complied with; • contribute to their assessment of the risks and controls within their business area, which feeds into NSG's statements of accountability and internal control
10.9	All instances of actual or suspected bribery, which come to the attention of a manager, must be reported immediately. It is appreciated that some employees will initially raise concerns with their manager, however, in such cases managers must not attempt to investigate the allegation themselves, and they have the clear responsibility to refer the concerns to the School Business Manager as soon as possible.
School Business Manager	
10.10	The School Business Manager monitors and ensures compliance with anti-fraud and corruption measures and activity.
10.11	The School Business Manager will decide whether there is sufficient cause to conduct an investigation, and whether the Police, External Audit or the ESFA need to be informed.
10.12	The School Business Manager will consult and take advice from Headteacher if a member of staff is to be interviewed or disciplined. The School Business Manager will not conduct a disciplinary investigation, but the employee may be the subject of a separate investigation by the Headteacher.
10.13	The School Business Manager will, depending on the outcome of investigations (whether on an interim/ongoing or a concluding basis) and / or the potential significance of suspicions that have been raised, inform the Chair of Governors, the External Auditors and ESFA of cases, as may be deemed appropriate or necessary.
Human Resources	
10.14	The Headteacher will liaise closely with Managers and from the outset, where an employee is suspected of being involved in bribery or corruption in accordance with agreed liaison protocols. The Headteacher is responsible for ensuring the appropriate use of NSG's Disciplinary Procedure. The Headteacher will consult NSG's HR Manager or appointed personnel advisers and shall advise those involved in the investigation in matters of employment law and in other procedural matters, such as disciplinary and complaints procedures. Close liaison between the Police and NSG's HR Manager or appointed personnel advisers will be essential to ensure that any parallel sanctions (i.e. criminal and disciplinary) are applied effectively and in a coordinated manner.
10.15	New joiners will be bound by a contractual obligation in the employment contracts not to engage in bribery as defined in the Anti-Bribery Policy.
Procurement	
10.16	Procurement practices will be conducted in a fair and transparent manner and not deal with contractors or suppliers known or reasonably suspected to be paying bribes. Before engaging contractors and suppliers, NSG will undertake properly documented due diligence. Unless prospective contractors and suppliers have effective Anti-Bribery programmes in place, NSG will contractually require them to comply with the Anti-Bribery Policy. Agreements with contractors and suppliers shall, at all times, provide for the necessary contractual mechanisms to enforce compliance with the Anti-Bribery arrangements.
11.	**Policy Review**
11.1	This policy will be monitored as part of NSG's annual internal review and reviewed on a three-year cycle or as required by legislature changes.