



# Pendle Education Trust

## Policy/Procedure/Guideline Review

<b>Policy/Procedure/Guideline:</b>	Anti-Bribery Policy
<b>Senior Manager Responsible:</b>	Chief Executive
<b>Trust Approval:</b>	October 2024
<b>Review date:</b>	4 years

### Pendle Education Trust

Nelson and Colne College, Scotland Road, Nelson, BB9 7YT

Tel 01282 440 249 Email [contact@pendleeducationtrust.co.uk](mailto:contact@pendleeducationtrust.co.uk)

Company Registration Number: 08263591

Place of Registration: England and Wales



## Introduction

Pendle Education Trust has 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 a service on behalf of the Trust), and external persons/ organisations with whom the Trust has external 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 communication ensuring that sensitive information is treated appropriately.
- Rigorously investigating instances of alleged bribery in accordance with the disciplinary procedure; 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 of The Trust and anyone acting for, or on behalf of, Pendle Education Trust ("associated persons"), including Trustees, 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 which may become a criminal matter for the individual.

Pendle Education 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 Governor, 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, providing the activity is customary under the circumstances, is proportionate, and is properly recorded/disclosed to the Trust in accordance with its procedures.

Employees and associated persons are requested to remain vigilant in preventing, detecting and reporting bribery. Employees and associated persons are expected to report any concerns regarding any suspected bribery in accordance with the Trust's Whistle Blowing Policy.





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