



<b>Policy:</b>	<b>Anti-Bribery Policy</b>
<b>Date of approval:</b>	March 2026
<b>Effective date:</b>	April 2026
<b>Next review date:</b>	March 2027

## **1. Purpose**

Kingsford Education Group (KEG) is committed to maintaining the highest standards of integrity, transparency, and ethical conduct in all its activities. KEG operates a zero-tolerance approach to bribery and corruption.

The purpose of this policy is to:

- Prevent bribery and corruption in all forms
- Ensure compliance with the UK Bribery Act 2010
- Protect KEG's reputation and maintain public trust
- Provide clear guidance to staff and associated persons on acceptable conduct
- Establish procedures for identifying, reporting, and addressing bribery risks

KEG is committed to embedding a culture of ethical behaviour and ensuring that all individuals acting on its behalf understand their responsibilities.

## **2. Scope**

This policy applies to all individuals working for or on behalf of KEG, including:

- Employees at all levels
- Senior management and governors
- Consultants, contractors, and agency staff
- Volunteers and temporary workers
- Any other "associated persons" performing services for or on behalf of KEG

The policy applies to all activities undertaken by KEG, including academic provision, commercial relationships, partnerships, procurement, and external engagement.

## **3. Definition of Bribery and Corruption**

### **3.1 Bribery**

Bribery involves offering, promising, giving, requesting, or accepting a financial or other advantage with the intention of inducing or rewarding improper performance.

A bribe may include:

- Money or cash equivalents
- Gifts, hospitality, or entertainment
- Loans, rewards, or incentives
- Any other advantage or benefit

### **3.2 Corruption**

Corruption refers to the abuse of entrusted power for personal gain or institutional advantage.

### 3.3 Facilitation Payments

Facilitation payments are unofficial payments made to secure or expedite routine actions. These are strictly prohibited under this policy.

## **4. Policy Statement**

KEG strictly prohibits all forms of bribery and corruption.

No employee or associated person may:

- Offer, give, or promise a bribe
- Request, agree to receive, or accept a bribe
- Engage in any activity that could be perceived as bribery or corruption

This prohibition applies regardless of whether the recipient is a public official, private individual, or organisation, and regardless of the location of the activity.

Bribery is prohibited whether it is intended to:

- Obtain a commercial, contractual, or regulatory advantage
- Influence decision-making improperly
- Secure personal benefit for the individual or others

Any breach of this policy will be treated as a serious disciplinary matter and may result in dismissal and/or referral to law enforcement authorities.

## **5. Gifts, Hospitality, and Business Courtesies**

KEG recognises that reasonable and proportionate hospitality and business courtesies may be part of normal professional practice.

However, such activities must:

- Be appropriate, proportionate, and reasonable
- Not be intended to influence decision-making improperly
- Be consistent with normal business practice
- Be transparent and properly recorded

Gifts or hospitality must not:

- Create a conflict of interest
- Be excessive or frequent
- Be offered during sensitive decision-making processes

All gifts and hospitality must be declared and recorded in accordance with KEG procedures.

## **6. Responsibilities**

### 6.1 Employees and Associated Persons

All individuals covered by this policy are responsible for:

- Acting with integrity and honesty at all times
- Complying with this policy and relevant legislation
- Avoiding situations that could give rise to bribery or corruption
- Reporting any concerns or suspicions promptly

### 6.2 Managers

Managers are responsible for:

- Promoting awareness of this policy
- Ensuring that staff understand their responsibilities
- Monitoring compliance within their areas
- Taking appropriate action where concerns arise

### 6.3 Kingsford Education Group (KEG)

KEG is responsible for:

- Implementing and maintaining effective anti-bribery controls
- Providing appropriate training and guidance
- Ensuring that risks are identified and managed
- Investigating allegations of bribery thoroughly and fairly

## **7. Training and Awareness**

KEG will ensure that all relevant staff receive appropriate training on:

- Recognising bribery and corruption risks
- Understanding legal obligations
- Applying this policy in practice

Training will be proportionate to the level of risk associated with specific roles.

## **8. Reporting Concerns**

All employees and associated persons are required to report any concerns or suspicions of bribery or corruption.

Reports should be made in accordance with KEG's Whistleblowing Policy.

KEG will:

- Treat all reports seriously
- Ensure that concerns are investigated promptly and confidentially

- Protect individuals who raise concerns in good faith

Failure to report known or suspected bribery may itself constitute a disciplinary matter.

## **9. Investigation and Enforcement**

All allegations of bribery or corruption will be investigated in accordance with KEG's disciplinary procedures.

Where appropriate:

- External authorities may be notified
- KEG will cooperate fully with law enforcement agencies

Confirmed breaches will result in appropriate disciplinary action, which may include dismissal, termination of contracts, or legal action.

## **10. Record Keeping and Financial Controls**

KEG will maintain accurate financial and operational records to ensure transparency and accountability.

All transactions must be:

- Properly recorded
- Supported by appropriate documentation
- Subject to internal controls

False, misleading, or incomplete records are strictly prohibited.