



Achieving together in faith

Holy Cross Catholic Multi-Academy Company

Anti-Corruption & Bribery Policy 2025 - 2028

Responsible for Policy	Martyn Alcott
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1.0 Purpose

- 1.1 The purpose of this policy is to confirm the Holy Cross Catholic Multi Academy Company commitment against fraud. The fulfilment of this Anti-Corruption and Bribery Policy will assist in the delivery of more effective risk management.

2.0 Introduction

- 2.1 Holy Cross Catholic Multi School Company is determined to demonstrate that it will not tolerate fraud, corruption or abuse of position for personal gain, wherever it may be found, in any area of School activity.
- 2.2 The MAC considers that all instances of fraud, corruption and other dishonesty endanger the achievement of the MAC's policies and objectives as they divert its limited resources from the provision of education. There is a clear recognition that the abuse of the MAC's resources, assets and services undermines the MAC's reputation and also threatens its sound financial standing.
- 2.3 The purpose of this Policy Statement is to set out for directors, governors and employees, the MAC's main objectives for countering bribery and corruption. This policy statement:
- Defines corruption and bribery
 - Identifies the scope of the applicability of the policy
 - Sets out the School's intended culture & stance against corruption and bribery
 - Identifies how to raise concerns and to report malpractice
 - Sets out responsibilities for countering fraud

3.0 Definitions

3.1 Corruption

- 3.1.1 Corruption will normally involve the fraud as defined below with some bribe, threat or reward being involved.
- 3.1.2 Fraud is a range of abuse and malpractice that is covered by the Fraud Act 2006. Fraud can be defined as an abuse of knowledge or financial position that is done deliberately to create a financial gain for the perpetrator or for a related person or entity and / or cause a loss to another. It can take place in many

ways; withholding information, deliberately misleading, misrepresenting a situation to others or by abuse of position. Irrespective of the definition applied, fraud is always deceitful, immoral, and intentional and creates a financial gain for one party and / or a loss for another.

3.2 Bribery

3.2.1 The Bribery Act 2010:

There are four key offences under the Act:

- bribery of another person (section 1)
- accepting a bribe (section 2)
- bribing a foreign official (section 6)
- failing to prevent bribery (section 7) The Bribery Act 2010

3.2.2 Bribery is not tolerated. It is unacceptable to:

- give, promise to give, or offer a payment, gift or hospitality with the expectation or hope that a business advantage will be received, or to reward a business advantage already given;
- give, promise to give, or offer a payment, gift or hospitality to a government official, agent or representative to "facilitate" or expedite a routine procedure;
- accept payment from a third party that you know or suspect is offered with the expectation that it will obtain a business advantage for them;
- accept a gift or hospitality from a third party if you know or suspect that it is offered or provided with an expectation that a business advantage will be provided by us in return;
- retaliate against or threaten a person who has refused to commit a bribery offence or who has raised concerns under this policy;

3.2.3 Facilitation Payments:

- Facilitation payments are not tolerated and are illegal. Facilitation payments are unofficial payments made to public officials in order to secure or expedite actions.

3.2.4 Gifts and Hospitality:

- This policy is not meant to change the requirements of the MAC's approach to gifts and hospitality as set out within the Financial Regulations. These make it clear that all offers of gifts and hospitality should be registered whether they are accepted or not.

4.0 Scope of Policy

- 4.1 This policy applies to all employees and anyone acting for, or on behalf of, the Company (“associated persons”), including directors, governors, other volunteers, temporary workers, consultants and contractors.
- 4.2 The Company expects that individuals and organisations (e.g. partners, suppliers, contractors, and service providers) with which it deals will act with integrity and without thought or actions involving fraud and corruption. Where relevant, the MAC will include appropriate clauses in its contracts about the consequences of fraud, bribery and corruption. Evidence of such acts is most likely to lead to a termination of the particular contract and will normally lead to prosecution.
- 4.3 The MAC recognises the importance of the seven principles of public life defined by the Nolan Committee 1995, and expects all governors, employees and those acting as its agents to conduct themselves according to them. The seven principles are detailed within the School’s Financial Regulations.
- 4.4 Through observance of these principles the MAC requires the directors, governors, employees and its agents to be alert to the possibility of fraud, corruption and dishonesty in all their dealings.
- 4.5 The MAC also requires that those employees responsible for its systems and procedures should design and operate systems and procedures which endeavour to minimise losses due to fraud, corruption, and other dishonest action and abuse.

5.0 Culture & stance against corruption

- 5.1 Holy Cross Catholic Multi Academy Company is determined that the culture and tone of the organisation will be one of honesty and opposition to fraud and corruption of any kind.
- 5.2 The MAC expects that the governing body and its employees at all levels will lead by example in ensuring adherence to legal requirements, financial rules, codes of conduct and prescribed procedures and practices.
- 5.3 The MAC implements and maintains systems of accountability and control to ensure that its resources are properly applied in the way it intended. These systems include, as far as is practical, adequate internal controls to detect not only significant errors but also importantly, fraud and corruption.

6.0 Raising Concerns

- 6.1 Directors, Governors, MAC employees and anyone acting for, or on behalf of, the MAC are an important element in the MAC's defence against fraud and corruption; they are expected to raise any concerns that they may have on these issues where they are associated with the MAC's activities.
- 6.2 The MAC's senior management and governors, will be robust in dealing with financial malpractice of any kind. Directors, Governors, employees of the MAC and 'associated persons' should follow the guidance issued in the **MAC's Whistleblowing Policy**.
- 6.3 All concerns reported, by whatever method, will be treated in confidence. Concerns should be raised with the Chief Executive Officer (CEO) in the first instance except when it relates to the CEO in which case the concern should be raised with the Chair of the MAC. This may mean that, depending on the level, type and details of the concerns you raise, that your concerns are investigated by the CEO, the Board of Directors or, in the case of very serious concerns, the Police.
- 6.4 Concerns in relation to potential breaches of security as a result of cybercrime should be reported immediately to the CEO who will contact the IT department for advice.

7.0 Monitoring and review

- 7.1 This Policy has been approved by the Resources Committee at its meeting on 16/10/2025 and is to be reviewed by the Resources Committee on a three-yearly basis.
- 7.2 The internal monitoring of the implementation of this policy will be the responsibility of the Chair of the Resources Committee who will produce reports for the Board of Directors as required.
- 7.3 The responsibility for ensuring that this policy and its associated processes and procedures, remain appropriate and comply with changes in legislation will be held by the CEO.