



Anti-Bribery Policy

Version	1
Owner	Audit and Risk Committee
Approving body	Board of Directors
Date approved	10 June 2026
Effective from	1 July 2026
Review frequency	Three years
Review date	1 July 2029

See Appendix A for version history

Anti-Bribery Policy

1. Purpose

- 1.1. Boomsatsuma Education Ltd ('Boomsatsuma') is committed to conducting its activities with integrity, transparency and in compliance with UK law, including the Bribery Act 2010 [\[Link\]](#).
- 1.2. This Policy sets out Boomsatsuma's approach to preventing bribery, establishes clear expectations for staff and others acting on its behalf, and ensures that proportionate procedures are in place to mitigate the risk of bribery in line with the organisation's size and activities.

2. Scope

- 2.1. This Policy applies to all staff and directors of Boomsatsuma, and to any other individuals or organisations acting on its behalf, including contractors, and consultants, agents, and other third parties.
- 2.2. All individuals within scope are required to comply with this Policy.

3. Definition of Bribery

- 3.1. For the purposes of this Policy, 'bribery' is defined, in line with the Bribery Act 2010, as the offering, promising, giving, requesting or accepting of a financial or other advantage with the intention of inducing or rewarding improper performance or securing an improper advantage.
- 3.2. 'Associated person(s)' means a person or organisation that performs services for or on behalf of Boomsatsuma.

4. Legal Framework

4.1. The Bribery Act 2010 establishes four key offences:

- Promising or offering a bribe (active bribery)
- Requesting or accepting a bribe (passive bribery)
- Bribery of a foreign public official
- Failure of an organisation to prevent bribery by persons associated with it.

4.2. Boomsatsuma prohibits all forms of bribery. No member of staff or associated person is permitted to engage in any activity that constitutes bribery.

5. Responsibilities

5.1. All staff and associated persons must:

- Avoid all forms of bribery, including offering, giving, requesting or accepting bribes
- Exercise good judgement in situations involving gifts, hospitality or potential conflicts of interest
- Report any suspicion or instance of bribery promptly in accordance with Section 8 of this Policy
- Cooperate fully with any investigation relating to suspected or actual bribery

5.2. Line managers are responsible for:

- Ensuring that their direct reports are aware of this Policy
- Supporting the implementation of this Policy within their areas of responsibility
- Providing appropriate guidance and taking reasonable steps to identify, address, and escalate matters related to bribery where appropriate.

5.3. The Director of Operations is responsible for receiving and considering concerns raised under this Policy and ensuring that appropriate action is taken, including escalation where required.

- 5.4. The Board of Directors retains overall accountability for ensuring that Boomsatsuma complies with this Policy and its legal obligations under the Bribery Act 2010.
- 5.5. The Executive Committee is responsible for the operational implementation of this Policy. This includes:
- Ensuring that concerns are appropriately considered and acted upon
 - Supporting effective internal reporting and escalation
 - Promoting a culture of integrity and compliance across the organisation.
- 5.6. The Audit and Risk Committee is responsible for oversight of risks relating to bribery and corruption as part of its wider responsibility for risk management and internal control. This includes:
- Monitoring any incidents or concerns raised under this Policy
 - Overseeing how bribery risks are identified, managed and mitigated
 - Reviewing this Policy and recommending updates to the Board of Directors.

6. Gifts and Hospitality

- 6.1. Boomsatsuma recognises that reasonable and proportionate hospitality and modest gifts may be appropriate in the normal course of business.
- 6.2. Gifts or hospitality must:
- Be proportionate and reasonable in value
 - Be given and received in good faith
 - Not create, or appear to create, an obligation or expectation of favour
 - Not influence, or be perceived to influence, any business decision.
- 6.3. Gifts or hospitality must not be offered or accepted where:

- A decision is pending or could reasonably be influenced
- There is an expectation that the recipient will provide something in return
- It could be perceived as an attempt to secure an improper advantage
- It is excessive or inappropriate in the circumstances

6.4. Gifts or hospitality involving cash or cash-equivalent items are not normally acceptable and should not be accepted.

6.5. Where there is any uncertainty, staff must seek advice from their line manager before accepting or offering a gift or hospitality. Line managers may seek guidance or refer a decision to the Director of Operations where required.

7. Associated Persons

7.1. Boomsatsuma expects the same standards of integrity from any associated person acting on its behalf, including contractors, agents and consultants.

7.2. Where associated persons are engaged to act on its behalf, Boomsatsuma will take proportionate steps to ensure that they are aware of, and operate in line with, this Policy. This may include:

- Making expectations around ethical conduct clear at the point of engagement
- Including appropriate terms within agreements where relevant
- Escalating any concerns regarding the conduct of associated persons.

7.3. Boomsatsuma will not engage with any associated person where there is a known or significant risk of bribery that cannot be appropriately managed.

8. Reporting Concerns

8.1. Any concerns about actual or suspected bribery must be raised promptly. This can be done by:

- Notifying a line manager

- Reporting the matter to the Director of Operations
- Raising the concern through Boomsatsuma's Whistleblowing Policy [\[Link\]](#).

8.2. Concerns may be raised through the Whistleblowing Policy where an individual prefers not to raise the matter directly, including where confidentiality is required.

8.3. Boomsatsuma will treat all concerns seriously and will support individuals who raise concerns in good faith. No individual will suffer detrimental treatment for raising a genuine concern.

9. Breaches

9.1. Where a breach involves a member of staff, it may result in a formal investigation under Boomsatsuma's disciplinary procedures and lead to disciplinary action, up to and including dismissal.

9.2. Where a breach involves an associated person, Boomsatsuma may take appropriate action, including termination of contracts or arrangements.

9.3. Breaches of this Policy may also constitute a criminal offence under the Bribery Act 2010. Where appropriate, Boomsatsuma will consider whether matters should be referred to relevant external authorities.

10. Monitoring and Reporting

10.1. Information relating to concerns or incidents associated with bribery will be recorded and monitored to support effective risk management, oversight, and the ongoing development of appropriate controls. This includes the type of concerns, how concerns were handled, and any actions taken, alongside relevant supporting information where appropriate.

10.2. Records relating to concerns or incidents under this Policy will be stored securely.

11. Review

- 11.1. This Policy will be reviewed periodically by the Audit and Risk Committee to ensure it remains aligned with relevant legislation, regulatory expectations, and provider practice.

Appendix A – Version History

Version	Date	Changes
1	10 June 2026	New draft