MEPA TRAINING

ANTI-FRAUD, CORRUPTION & BRIBERY POLICY

THIS POLICY IS WRITTEN FOR AND APPLIED TO MEPA STUDIOS, MEPA ACADEMY AND MEPA COLLEGE .

Updated & Adopted:	August 2026
Review Date:	August 2027

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1. PURPOSE AND POLICY STATEMENT

MEPA Studios, MEPA Academy and MEPA College (together, "MEPA") are committed to conducting all activities honestly, fairly and transparently. MEPA has zero tolerance for fraud, corruption and bribery and will maintain proportionate procedures designed to prevent, detect and respond to such conduct.

No person acting for or on behalf of MEPA may offer, promise, give, request, agree to receive or accept a bribe or other improper advantage. Business opportunity, income, convenience or customary local practice never justifies prohibited conduct.

MEPA's governing body and Senior Leadership Team ("SLT") support this policy and expect concerns to be raised promptly. A breach may result in disciplinary action, dismissal, termination of a relationship, recovery action and/or referral to law-enforcement or regulatory authorities.

2. LEGAL AND REGULATORY FRAMEWORK

This policy supports compliance with applicable UK law, including the Bribery Act 2010, the Fraud Act 2006, the Theft Act 1968, the Economic Crime and Corporate Transparency Act 2023 ("ECCTA") and the whistleblowing provisions of the Employment Rights Act 1996, as amended by the Public Interest Disclosure Act 1998.

The Bribery Act 2010 creates offences of bribing another person, being bribed, bribing a foreign public official and, for relevant commercial organisations, failing to prevent bribery by an associated person. An organisation may have a defence to the corporate offence if it can show that it had adequate procedures designed to prevent bribery.

ECCTA's corporate offence of failure to prevent fraud applies to organisations meeting the statutory size criteria. Whether or not MEPA meets those criteria at any time, MEPA adopts the government's reasonable-procedures principles as good practice.

This policy is a governance document and does not replace legal advice. Where law or regulatory requirements impose a higher standard, that higher standard applies.

3. SCOPE

This policy applies to MEPA Studios, MEPA Academy and MEPA College and to activities undertaken in the UK or overseas. It applies to all governors or directors, SLT members, employees, workers, volunteers, agency staff and students where appropriate.

MEPA also expects associated persons and third parties performing services for or on its behalf—including contractors, consultants, agents, suppliers, introducers and partners—to comply with equivalent standards. Relevant contractual terms, due diligence and monitoring should be proportionate to the risk.

The policy applies whenever a person is acting for MEPA, using MEPA funds or resources, representing MEPA, or seeking to obtain or retain business or another advantage for MEPA.

4. DEFINITIONS AND PROHIBITED CONDUCT

Bribery. Offering, promising, giving, requesting, agreeing to receive or accepting a financial or other advantage to induce or reward improper performance, or where acceptance itself would be improper.

Fraud. Dishonest conduct intended to make a gain, cause a loss or expose another to risk of loss, including false representation, failure to disclose information when legally required, or abuse of position.

Corruption. Abuse of entrusted power or position for private or improper gain.

Associated person. A person who performs services for or on behalf of an organisation, assessed by the circumstances rather than the label used in a contract.

Facilitation payment. An unofficial payment or benefit intended to secure or speed up a routine action. Such payments are prohibited, even if small or customary, except where necessary to protect life, health or safety. Any payment made under duress must be reported promptly and recorded accurately.

Kickback. The return of part of a payment or benefit as a reward for arranging or influencing a transaction. Kickbacks are prohibited.

Prohibited conduct includes the following:

- offering or accepting an improper payment, gift, favour, discount, commission, employment opportunity or other advantage;
- bribing or improperly influencing a public official, including through an intermediary;
- using a third party to do anything that would be prohibited if done directly;
- creating false, misleading, incomplete or off-book records;
- concealing, ignoring or failing to report suspected misconduct; and
- retaliating against a person who raises a concern or assists an investigation in good faith.

5. PREVENTION PRINCIPLES

MEPA's controls will be proportionate to its bribery and fraud risks and informed by the following principles:

- proportionate, risk-based procedures;
- visible commitment and oversight from the governing body and SLT;
- periodic, documented risk assessment;
- proportionate due diligence on associated persons and transactions;
- clear communication and training; and
- ongoing monitoring, review and improvement.

6. RESPONSIBILITIES AND GOVERNANCE

6.1 Governing body and Senior Leadership Team

- set the tone from the top and approve this policy;
- ensure appropriate resources, responsibilities and reporting routes;
- review material risks, allegations, investigations and remediation; and
- ensure that commercial or operational pressure does not override this policy.

6.2 Managers and budget holders

- identify and manage risks within their area;
- apply approval, procurement, segregation-of-duties and record-keeping controls;
- complete proportionate checks before appointing or paying third parties; and
- escalate concerns and preserve relevant records.

6.3 Everyone covered by this policy

- act honestly and comply with this policy and related procedures;
- refuse prohibited conduct and seek advice when uncertain;
- declare gifts, hospitality and conflicts as required;
- complete required training; and
- report suspected or attempted misconduct promptly.

7. RISK ASSESSMENT AND DUE DILIGENCE

MEPA will periodically assess and document fraud, bribery and corruption risks, including risks arising from geography, public-sector contact, procurement, cash handling, refunds, recruitment, agents or intermediaries, sponsorship, fundraising, grants, commissions, expenses and unusual payment arrangements.

Before entering or renewing higher-risk relationships, MEPA will conduct proportionate due diligence. This may include confirming identity, ownership, capability, reputation, conflicts, sanctions or adverse information, the business rationale, services to be provided, payment terms and bank-account ownership.

Warning signs must be escalated and resolved before proceeding. Examples include requests for cash, payment to a different person or jurisdiction, excessive or vague fees, refusal to document services, undisclosed relationships, unusual urgency or a reputation for improper conduct.

Contracts should clearly describe the services and remuneration and, where appropriate, include compliance, audit, termination and cooperation provisions. Due diligence must be refreshed when risk changes.

8. GIFTS, HOSPITALITY AND EXPENSES

Reasonable, proportionate and bona fide gifts or hospitality may be permitted only where they have a legitimate purpose, are appropriate in the circumstances, comply with applicable procedures and could not reasonably be seen as intended to influence a decision.

Cash and cash equivalents—including vouchers readily exchangeable for cash—must not be offered or accepted. Gifts or hospitality must not be offered to or accepted from a party involved in a live tender, admissions decision, assessment, recruitment, disciplinary process or other sensitive decision where influence could be perceived.

Any gift or hospitality requiring declaration or approval under MEPA procedures must be recorded promptly and accurately in the designated register. Where uncertain, obtain written approval from an appropriate manager or SLT member before proceeding. Expenses must be supported by genuine receipts and accurately describe the business purpose and attendees.

9. DONATIONS, SPONSORSHIP AND FUNDRAISING

MEPA does not make political contributions. Charitable donations, sponsorship, bursaries, fundraising arrangements and community support must be lawful, transparent, properly approved and never used to obtain an improper advantage or disguise a payment to an individual.

The recipient, purpose, value, approval and any conditions must be documented. Appropriate checks must confirm that funds or benefits reach the intended recipient and are used for the stated purpose.

10. CONFLICTS OF INTEREST

Actual, potential or perceived conflicts between personal interests and MEPA's interests must be declared promptly. Examples include a personal, family or financial connection to a supplier, applicant, student, employee, donor or other party affected by a decision.

The person must not participate in the relevant decision unless an authorised manager has assessed the conflict, documented safeguards and confirmed participation is appropriate. Conflicts and agreed mitigations must be recorded in accordance with MEPA procedures.

11. FINANCIAL CONTROLS AND RECORD-KEEPING

Transactions must be legitimate, properly authorised, supported by appropriate documentation and recorded completely and accurately. No undisclosed or unrecorded fund, account or asset may be created or maintained.

MEPA will apply proportionate controls such as approval limits, segregation of duties, supplier verification, purchase-order and invoice matching, bank-detail change checks, reconciliations, inventory controls and periodic management review. No person may approve their own expense or a payment from which they benefit.

Records relating to risk assessments, due diligence, approvals, gifts and hospitality, conflicts, expenses, investigations and remediation must be retained securely in accordance with MEPA's retention schedule, data-protection obligations and any legal hold. Records must not be altered, concealed or destroyed to obstruct a review or investigation.

12. REPORTING CONCERNS AND PROTECTION FROM RETALIATION

Anyone who is offered a bribe, asked to make an improper payment, suspects fraud or corruption, or believes this policy may have been breached must raise the concern as soon as possible. A concern may be raised with a line manager, an SLT member or through MEPA's Whistleblowing Policy. If the usual recipient is implicated or the person is uncomfortable using that route, the concern should be raised with another appropriate senior person under the Whistleblowing Policy.

Reports should include available facts and documents, but a reporter should not investigate personally, confront a suspected person or place themselves at risk. Genuine concerns may be raised even where the reporter is uncertain or later proves mistaken.

MEPA prohibits retaliation against anyone who raises a concern or assists an investigation in good faith. Deliberately false or malicious allegations may, however, be addressed under the relevant disciplinary procedure. Confidentiality will be protected as far as reasonably possible, subject to fair investigation and legal obligations.

Nothing in this policy prevents a worker from making a protected disclosure to an appropriate prescribed person or otherwise exercising a legal right.

13. INVESTIGATION, ESCALATION AND CONSEQUENCES

MEPA will assess reports promptly and determine an independent, proportionate response. Relevant documents, accounts, messages and other evidence must be preserved. Investigations will be conducted fairly, confidentially so far as practicable and without avoidable conflicts of interest.

Where appropriate, MEPA may seek specialist legal, audit, safeguarding or investigative advice; suspend a transaction or access; notify insurers, funders, banks or regulators; recover losses; and report suspected crime to the police, Serious Fraud Office or another competent authority.

Breach of this policy may amount to misconduct or gross misconduct and may lead to disciplinary action up to and including dismissal. MEPA may terminate contracts or relationships with third parties and may pursue civil recovery. Any action will follow applicable contractual, employment, safeguarding and procedural requirements.

14. TRAINING AND COMMUNICATION

This policy will be communicated to those covered by it. Induction and refresher training will be proportionate to role and risk, with enhanced training for those involved in leadership, finance, procurement, recruitment, admissions, fundraising, overseas activity or management of higher-risk third parties.

Relevant associated persons will be informed of MEPA's standards and, where proportionate, required to confirm compliance. Training completion and material communications will be recorded.

15. MONITORING, REVIEW AND DOCUMENT CONTROL

The SLT will monitor the operation and effectiveness of this policy, including risk assessments, declarations, due diligence, training completion, control exceptions, reports, investigations and remedial actions. Lessons learned will be used to strengthen procedures.

This policy will be reviewed at least annually and sooner following a material incident, organisational or risk change, control weakness, or relevant legal or regulatory development.