

South Staffordshire College



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# Anti-Bribery Policy

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| Reference: Version        | Final                                |
| Policy Originator:        | Deputy Principal Finance & Resources |
| Equality Impact Assessed: | October 2019                         |
| Approved by:              | Board                                |
| Date Approved:            | October 2019                         |
| Review Interval:          | Biennial                             |
| Last Review Date:         | October 2016                         |
| Next Review Date:         | October 2021                         |
| Audience:                 | All Staff & Governors                |

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## Anti-Bribery Policy

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### 1.0 Policy Statement

- 1.1** The purpose of this Policy is to support the achievement of the outcomes identified within the College's 2025 Strategic Vision. The College aims to continually improve its outcomes and processes and to be a truly outstanding organisation.
- 1.2** The College's reputation with the community it serves, and other stakeholders is underpinned by ethical behaviour, financial probity and honesty.
- 1.3** The College takes a zero-tolerance approach to bribery and corruption and is committed to acting professionally, fairly and with integrity in all its business dealings and relationships wherever it operates and implementing and enforcing effective systems to counter bribery.
- 1.4** This Policy will support the implementation of our "Purpose":

*"Transforming the life chances of our communities."*

### 2.0 Scope

- 2.1** This Policy applies to all employees and anyone acting for, or on behalf of, the College ("associated persons"), including governors, other volunteers, temporary workers, consultants and contractors.
- 2.2** Other policies and procedures linked to this Policy include:
- Financial Regulations
  - Fraud Policy

### 3.0 Values and Guiding Principles

3.1 This Policy will be implemented in a manner that embraces our “Values” and “Guiding Principles”:

#### Guiding Principles:

- Excellence in learning and teaching,
- Community contribution,
- Entrepreneurial attitude.

#### Values:

- *Togetherness* - Working together to provide an outstanding experience for our learners, employers and communities.
- *Standards* - High performance to enhance the life chances and success of learners, communities and employers.
- *Customer Care* - Exceeds expectations of all by providing creative leadership, inclusivity and respect for people and their future.
- *Sustainability* - A beacon for sustainable development, to educate, inspire and enhance quality of life.

### 4.0 General

4.1 This Policy will be implemented in accordance with all existing and emerging legislation.

4.2 Bribery is defined as giving (or offering) or receiving (or requesting) a financial or other advantage in connection with the improper performance of a position of trust, or a function that is expected to be performed impartially or in good faith'. (Bribery Act 2010)

4.3 The Bribery Act sets out four offences:

- Offering, promising or giving a bribe,
- Requesting, agreeing to receive or accepting a bribe,
- Bribing a foreign public official,
- Failure of an organisation to prevent bribery.

4.4 The key corporate areas where there is an acknowledged risk of bribery include:

- Giving and receiving gifts and hospitality
- Procurement and facilitation payments
- Recruitment
- Political and charitable donations
- Sponsorship

- 4.5** 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 may become a criminal matter for the individual.
- 4.6** The College 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 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 College's behalf. The bribe might be made in order to:
- Gain any commercial, contractual or regulatory advantage for the College in a way which is unethical;
  - Gain any personal advantage, pecuniary, or otherwise, for the individual or anyone connected with the individual.
- 4.7** This Policy is not intended to prohibit appropriate corporate entertainment and/or hospitality undertaken in connection with the College's business activities, provided the activity is customary under the circumstances, is proportionate, and is properly recorded/disclosed to the College in accordance with its procedures (refer to the College's Financial Regulations regarding Gifts and Hospitality Bribery Act 2010).
- 4.8** 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 College's procedures (refer to the College's Whistleblowing Policy).

## **5.0 Monitoring and Review**

- 5.1** The College will review this Policy biennially.
- 5.2** Responsibility for monitoring the implementation of the Policy lies with the Deputy Principal Finance & Resources.
- 5.3** 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 Deputy Principal Finance & Resources.