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# Anti-Bribery Policy

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| **Document title:** | Anti-Bribery Policy |
| **Audience:** | All employees of the college and its subsidiary companies, student  body, governors. |
| **Version:** | V2.5 |
| **Approved by:** | Corporation |
| **Date approved:** | 25 May 2022 |
| **Date of next review:** | April 2023 |
| **Document Owner:** | Vice Principal Finance & Corporate Services |
| **Equality and Impact Assessment:** | Yes |
| **Student Friendly Version** | NA |

**Revision history**

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| **Version** | **Type (new, replacement, revision)** | **Date** | **History (reason for changes)** |
| V2.5 | Revision | April 2022 | Updated to reflect change in job titles |
| V2.4 | Revision | June 2021 | Annual Review |
| V2.3 | Revision | March 2021 | Separate out Policy and Procedure |
| V2.2 | Revision | April 2020 | Reviewed to ensure in line with statutory requirements (no changes), the National Fraud Office no longer exists ref has been removed; changes to job title. |

**Monitoring and review**

This policy will be reviewed by SLT, the Audit Committee and the Corporation every year.

# Anti-Bribery Policy

**Purpose of the Policy**

The policy and the procedure sets out Bradford College’s policy in dealing with bribery or suspected bribery. This policy details the arrangements made in the College for such concerns to be raised by employees or members of the public.

Bradford College does not tolerate bribery. The intention is to eliminate all bribery as far as possible. The aim of the policy and procedure is to protect the property and finances of the College.

# The college will:

* Bradford College values its reputation for ethical behaviour and for financial probity and reliability. It recognises that over and above the commission of any crime, any involvement in bribery will also reflect adversely on its image and reputation. Its aim therefore is to limit its exposure to bribery by:
  + - Setting out a clear anti-bribery policy;
    - Training its managers so that they can recognise and avoid the use of bribery by themselves and others;
    - Encouraging its employees to be vigilant and to report any suspicion of bribery, providing them with suitable channels of communication and ensuring sensitive information is treated appropriately;
    - Rigorously investigating instances of alleged bribery and assisting the police and other appropriate authorities in any resultant prosecution;
    - Taking firm and vigorous action against any individual(s) involved in bribery.
    - Bribery - 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).
    - The College and its associated subsidiary companies under the Anti Bribery Policy has restrictions as set out under the Anti-Bribery Procedures under the following categories :
* Prohibits the offering, the giving, the solicitation or the acceptance of any bribe.
* Prohibits contractual or regulatory advantage in a way which is unethical or in order to gain any personal advantage.
* Prohibits facilitation payments to secure or expedite the performance of a routine action.
* Courtesy gifts and hospitality must not be given or received in return for services provided or to obtain or retain business.
* The College does not make any contributions to politicians, political parties or election campaigns
* Sponsoring contributions must be transparent, pursuant to a written agreement, for legitimate business purposes, and proportionate to the consideration offered by the event host.
* Sponsorship links to the development of guidelines and advice, this should be carried out in consultation with the Senior Compliance Officer (the Head of Finance).

## **Linked policies**

Anti-Fraud Policy

Gifts and Hospitality Policy

Procurement Policy

Business Expenses Travel and Subsistence policy

Financial Regulations

Whistleblowing policy and procedures

Rules relating to the Conduct of Staff

Declaration of Interests

## **Linked procedures**

Anti-Bribery Procedure