



## Anti-Bribery Policy

<b>Document title:</b>	Anti-Bribery Policy
<b>Audience:</b>	All employees of the college and its subsidiary companies, student body, governors.
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<b>Approved by:</b>	Corporation
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<b>Document Owner:</b>	VP Finance & Procurement
<b>Equality and Impact Assessment:</b>	Yes
<b>Student Friendly Version</b>	NA

### Revision history

Version	Type (new, replacement, revision)	Date	History (reason for changes)
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.
V2.3	Revision	March 2021	Separate out Policy and Procedure
V2.4	Revision	June 2021	Annual Review

### 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 Director of Finance and Procurement).

## **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