

ANTI-BRIBERY POLICY – November 2017

1. INTRODUCTION

The Bribery Act 2010 came into force on 1 July 2011 and introduces an offence for organisations of “failing to prevent bribery”. Under the Act organisations need to have in place adequate procedures to prevent bribery occurring.

2. POLICY STATEMENT

Grantham College values its reputation for ethical behaviour and for financial probity and reliability. The College has a zero tolerance for bribery and corruption. The College’s reputation with the community it serves and other stakeholders is underpinned by ethical behaviour, financial probity and honesty. The College aims to limit its exposure to bribery by:

- Setting out a clear anti-bribery policy;
- Encouraging staff to be vigilant and to report any suspicious behaviour, providing them with suitable channels of communication and ensuing sensitive information is treated appropriately. Please refer to College’s Whistleblowing Procedure;
- Rigorously investigating instances of alleged bribery and assisting police and other appropriate authorities in resultant prosecution;
- Taking firm and vigorous action against any individuals involved in bribery;
- Embedding an understanding of the College’s anti-bribery policy amongst all its staff, governors, “associated persons” (any person performing services for or on behalf of the College) and external persons/organisation with whom the College has commercial relations;
- Training staff as appropriate so that they can recognise and avoid the use of bribery by themselves and others.

3. SCOPE

This policy applies to governors, co-opted members of committees and all staff who work for the College. It also covers associated persons (who perform services for or on behalf of the College), volunteers, temporary workers, consultants and contractors.

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 contribute a serious disciplinary offence which may lead to dismissal and may become a criminal matter for the individual.

4. THE POLICY

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 or not 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 regulating 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.

This policy is not intended to prohibit appropriate corporate entertainment and/or hospitality undertaken in connection with the College’s business activity, provided the activity is customary under the circumstances, is proportionate and is properly recorded/disclosed to the College in accordance with its procedures outlined in the College’s Gifts and Hospitality Policy.

Employees and associated persons are requested to remain vigilant in preventing, detecting and reporting bribery. Employees and associated persons are expected to report concerns regarding suspected bribery in accordance with the College's Whistleblowing/Public Interest disclosure procedures.

5. RELATED POLICIES AND PROCEDURES

The following policies and procedures have been developed to demonstrate to all that the College will not tolerate anybody who it employs or works with, entering into fraudulent or corrupt acts that would damage its reputation and/or financial trading;

- Anti-Fraud Policy
- Financial Regulations
- Whistleblowing/Public Interest Disclosure procedures
- Risk Management Policy & Procedures
- Staff Disciplinary procedures
- Gifts & Hospitality Policy

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