

# Anti Bribery & Corruption policy



## Change Control

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<b>Post of Policy Holder</b>	CEO
<b>Author of Policy</b>	Wendy Bowyer
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## Policy Statement

The policy statement below sets out the college's responsibilities and those associated with it in upholding the College's position of zero tolerance towards bribery and corruption.

The College takes its legal responsibilities very seriously and has identified that certain activities could create particular risks for the organisation, in particular: 1) recruitment of students; 2) receipt of gifts and donations; 3) Grant funding; and 4) procurement and tendering for work projects, consumables and large capital items.

To address these risks the College has introduced this policy, ensured a risk assessment is in place which will be subject to ongoing review. The CEO alongside the Estates and Facilities Manager, Finance Manager and Director of Education will all be key people responsible to ensure compliance and that processes are being followed to mitigate the risk to the organisation and protect its employees.

The Risk Assessment will ensure charity has assessed its main risk areas for the purpose of putting adequate procedures in place and they include the making of grants, offering of students places and the giving/receiving of gifts and hospitality which are intended to be, or could be perceived, as bribes.

Trustees will ensure they keep abreast of Charity Commission requirements. The Policy Statement is built on its values as a supporter of education and the College's Trustees' commitment to act with integrity and transparency in its dealings.

### What is bribery?

A bribe is an inducement or reward offered, promised or provided in order to gain any commercial, contractual, regulatory or personal advantage.

### Hospitality & Gifts

This policy does not prohibit normal and appropriate hospitality (given and received) to or from third parties and the giving or receipt of gifts. Appropriate

hospitality and gifts would include where the items are given with no intention of influencing a third party to obtain or retain business, or to reward the provision or retention of business or a business advantage, or explicit or implicit exchange for favours or benefits.

### **What to do if you receive a gift?**

Any gifts received should be declared to your line manager and a record made of the receipt of the item. All items given to an employee are in essence given to the charity and not the individual.

Any gifts received should be recorded ..... And your line manager will advise on the future use of that item which will also be recorded.

### **Donations**

The College does not make charitable donations or contributions to political parties or any other organisations that are not referenced in our Finance or Inter Company Policy.

### **Individual responsibilities**

Employees at Petty Pool must ensure that they read, understand and comply with this policy. The prevention, detection and reporting of bribery and other forms of corruption are the responsibility of all those working for the Charity. All staff are required to avoid any activity that might lead to, or suggest, a breach of this policy. They must notify your manager as soon as possible, if they believe or suspect that a conflict with this policy has occurred, or may occur in the future.

### **Finance Processes**

The Charity must keep financial records and have appropriate measures in place, which will evidence the business reason for making payments to third parties. All accounts, invoices and other documents and records relating to dealings with third parties, should be prepared and maintained with strict accuracy and completeness. No accounts must be kept "off the record" to facilitate or conceal improper payments.

### **How to raise your concerns if you suspect corruption or bribery?**

Colleagues are encouraged to raise concerns about any issue or suspicion of malpractice at the earliest opportunity with their line manager.

A copy of the policy will be published on Databridge and be accessible for all, it will form part the induction process for all colleagues to read and familiarise themselves with. Any changes will be made a review date and will follow the governance process for policy changes.

Petty Pool Trustees and CEO treats breaches of this policy extremely seriously and will investigate any potential breach in accordance with the disciplinary policy and could deem breaches of this policy as gross misconduct leading to dismissal.