

## Audit Committee Meeting

Date of Meeting	Monday 15 May 2017
Paper Title	Anti-Bribery Policy
Agenda Item	15
Paper Number	AC4-K
Responsible Officer	Jim Godfrey, Interim Finance and Resources Director
Status	Disclosable
Action	For approval

### 1. Report Purpose

- 1.1. This paper provides an Anti-Bribery policy for GCRB and seeks the approval of this Committee.

### 2. Recommendations

- 2.1. The Committee is invited to **approve** this policy.

### 3. Background

- 3.1. In accordance with the Bribery Act 2010, GCRB is required to have such a policy.

### 4. Risk Analysis

- 4.1. GCRB's policy relating to Anti-Bribery is a requirement of the Financial Memorandum.

### 5. Legal Implications

- 5.1. Approval of the attached policy will ensure that GCRB is compliant with relevant legislation and the Financial Memorandum.

### 6. Financial Implications

- 6.1. There are no specific financial implications arising from the proposed policy.

### 7. Regional Outcome Agreement Implications

- 7.1. Through the conditions of grant associated with the Regional Outcome Agreement, GCRB is required to conduct its affairs in accordance with the expected standards of good governance, which include establishing appropriate arrangements in relation to anti-bribery.

# Anti-Bribery and Corruption Policy

## 1. Policy Statement

The Bribery Act 2010 came into effect on April 2011, superseding previous legislation. Notably, it made failing to prevent bribery a corporate offence. It also made bribing a foreign public official an individual criminal offence.

Glasgow Colleges' Regional Board (GCRB) is committed to conducting its activities with the highest ethical standards. It expects its employees, and representatives, to reflect this commitment in their work, behaving honestly and with personal integrity. GCRB will not tolerate bribery or corruption and is committed to preventing bribery and corruption by its staff and by any party acting on its behalf.

Bribery or corruption by GCRB employees/representatives will be treated as a serious disciplinary offence. Should it occur, GCRB will take firm action, which may include dismissal and legal action.

## 2. Principles

- a. This policy is **proportionate to the risks** faced and the nature, scale and complexity of GCRB's activities.
- b. The **top-level commitment** is sought to prevent bribery and promote a culture in which bribery is unacceptable.
- c. GCRB will apply **due diligence** procedures in respect of persons who perform services for, and on behalf of, GCRB in order to mitigate bribery risks.
- d. GCRB will ensure its bribery is embedded and understood through internal and external **communication**.
- e. GCRB will **monitor and review** this policy to prevent bribery and make improvements where necessary. The risks GCRB faces may change and this policy will be subject to regular review.

## 3. Scope

This policy applies to every member of staff, including temporary staff, agency staff, voluntary workers and staff of subsidiary companies. It applies to all activities of GCRB. GCRB expects anyone acting on its behalf to have arrangements in place to prevent bribery and corruption. This includes agents and others who represent GCRB, and suppliers who perform services for GCRB in the UK and overseas.

## **4. Standards**

Staff, and other persons who act on behalf of GCRB, are expected to adhere to the following standards:

- a. They must not seek a financial or other advantage for GCRB through bribery. They must not give, or offer to give, a bribe, and they must not receive, or agree to receive, a bribe.
- b. They must not make, or accept, facilitation payments.
- c. They must not engage in any form of fraudulent activity.
- d. They must abide by GCRB's financial regulations on gifts and hospitality. Under no circumstance must the receipt of gifts or hospitality influence the choice of a supplier, and, if there is any doubt, then gifts and/or hospitality must be refused.
- e. They must report any suspicion of bribery or corruption; either to their line-manager and/or through GCRB's Whistleblowing Policy. A deliberate failure to report suspicions of corruption, or to conceal corrupt action by others, will be subject to disciplinary action.

## **5. Training and its objectives**

GCRB will assist staff/representatives in understanding their duties in terms of UK Anti-Bribery and Corruption legislation.

## **6. Responsibilities**

- a. Glasgow Colleges' Regional Board is responsible for this policy.
- b. The Board Secretary is responsible for communicating the policy to staff and ensuring the policy is reviewed at least once in every 2 years.
- c. All employees are expected to adhere to GCRB's anti-bribery and corruption policy and report any suspicion of bribery or corruption; either to their line-manager and/or through GCRB's Whistleblowing Policy.