
Audit Committee Meeting

Date of Meeting	Tuesday 5 October 2021
Paper Title	Anti-Bribery Policy
Agenda Item	15
Paper Number	AAC1-I
Responsible Officer	Jim Godfrey, Finance and Resources Director
Status	Disclosable
Action	For approval

1. Executive Summary

1.1. This paper provides a review of the Anti-Bribery policy for GCRB.

2. Recommendations

2.1. The Committee is invited to **recommend** that the Board approve the revised policy.

3. Background

- 3.1.** In accordance with the Bribery Act 2010, GCRB is required to have such a policy.
- 3.2.** The original policy was approved by GCRB in June 2017 and reviewed in October 2019. The policy has been reviewed and updated once more in accordance with best practice.

4. Risk and Compliance Analysis

- 4.1.** The risk of bribery within GCRB is considered to be low. However, this policy affirms the commitment of GCRB to the highest ethical standards and communicates its position.
- 4.2.** Approval of the attached policy will ensure that GCRB is compliant with relevant legislation, good practice and the Scottish Public Finance Manual.
- 4.3.** 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.

5. Financial and Resource Analysis

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

6. Equalities Implications

- 6.1.** There are no equalities implications arising from this report.

7. Resource Implications

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

8. Learner Implications

- 8.1.** The direct impact of this policy on learners is expected to be low.

GLASGOW COLLEGES' REGIONAL BOARD

Anti-Bribery Policy

October 2021

Document Control Information	
Lead Responsibility:	Finance and Resources Director
Reviewed by the Executive Director:	October 2021
Approved by the Board:	TBC
Date of Next Review:	October 2023

1. Introduction

The purpose of this policy is to establish a framework within Glasgow Colleges' Regional Board (GCRB) that facilitates the prevention and elimination of fraud.

The Bribery Act 2010 came into effect on 1 July 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. Purpose

This policy applies to any irregularity, or suspected irregularity, involving employees as well as consultants, suppliers, contractors, and/or any other parties with a business relationship with this organisation. GCRB expects anyone acting on its behalf to have arrangements in place to prevent bribery. This includes suppliers who provide services and others who represent GCRB. GCRB is committed to taking all practical steps:

- to prevent being subjected to bribery;
- to facilitate confidential and protected reporting of known or suspected bribery in association with GCRB's Public Interest Disclosure ("Whistle-blowing") policy and procedures;
- to identify and detect any instances of bribery at the earliest opportunity;
- to investigate any instances of bribery, with police involvement where appropriate;
- to take appropriate action to deal with any instances of bribery and with any perpetrators after investigation.

The following principles apply to this policy:

- This policy is **proportionate** to the risks faced and the nature, scale and complexity of GCRB's activities.
- The **top-level commitment** is sought to prevent bribery and promote a culture in which bribery is unacceptable.
- 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.
- GCRB will ensure its anti-bribery policy is embedded and understood through internal and external **communication**.
- 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 everyone working on behalf of GCRB including employees, board members, temporary/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:

- 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.
- They must not make, or accept, facilitation payments.
- They must not engage in any form of fraudulent activity.
- 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.
- 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

- Glasgow Colleges' Regional Board is responsible for this policy.
- The Finance and Resources Director is responsible for communicating the policy to staff and ensuring the policy is reviewed at least once in every 2 years.
- 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.