

Anti-Bribery Policy

INTRODUCTION

The UKCE is committed to acting lawfully, ethically and with integrity in all its dealings. As part of this commitment, all forms of bribery are considered unacceptable and the College strictly prohibits such acts as a criminal offence. This is in accordance with legal requirements set out in UK criminal legislation.

BRIBERY

Bribery is defined as the offer, promise, giving, demanding or acceptance of an advantage as an inducement for an action which is illegal, unethical, a breach of trust, or the improper performance of a contract.

Acts of bribery are designed to influence the individual in the performance of his/her duty and induces him/her to act dishonestly.

Bribes can take various forms, including money, gifts, entertainment or hospitality, “kickbacks”, excessive commissions, “facilitation” payments, unwarranted expenses, or anything else of value or form of inducement. It does not have to be the person to whom the bribe is offered, or who receives it, who is deemed to act improperly.

PRINCIPLES

Agreeing to make a bribe or receiving one is part of this prohibited conduct. It is not necessary for a bribe to have actually taken place for there to be liability. Bribery is prohibited in dealing with anybody, irrespective of whether they are based in the public or private sector.

It is prohibited, directly or indirectly, for any employee or person working on UKCE’s behalf to offer, give, request or accept any bribe to or from any person in order to gain commercial, contractual or regulatory advantage for the College, or in order to gain any personal advantage for an individual or anyone connected with the individual in a way that is unethical.

It is the responsibility of each staff member, student, contractor and any third parties directly involved in acting on the College’s behalf to comply with relevant legislation and the terms of this Policy and its associated procedures, identify and report bribery situations where there is a suspicion or risk of bribery, and consider the duty to make appropriate disclosures as necessary.

GIFTS AND HOSPITALITY

Giving or receiving gifts and hospitality can be an important aspect of developing and maintaining business relationships. Nonetheless, all such gifts and hospitality should be for a genuine reason, reasonable and given in the ordinary course of business.

Reviewed in June 2023. Reviewed annually or more often as required

