

# 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. We require compliance, from everyone connected with our business, with the highest ethical standards and anti-bribery laws applicable. Integrity and transparency are of utmost importance to us and we have a zero tolerance attitude towards corrupt activities of any kind, whether committed by our employees or by third parties acting for us or on our behalf.

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.

## SUSPICION

If we suspect that you have committed an act of bribery or attempted bribery, an investigation will be carried out and, in line with our disciplinary procedure where appropriate, action may be taken against you which may result in your dismissal, or the immediate cessation of our business arrangement with you.

## REPORTING

If you, as an employee or person working on our behalf, suspect that an act of bribery or attempted bribery has taken place, even if you are not personally involved, you are expected to report this to your Line Manager. You may be asked to give a written account of events.

Staff are reminded of the college's Whistleblowing Policy which is available in this Employee Handbook.

## GIFTS AND HOSPITALITY

We realise that the giving and receiving of gifts and hospitality as a reflection of friendship or appreciation where nothing is expected in return may occur, or even be commonplace, in our industry.

No gift should be given nor hospitality offered by an employee, student, supplier or anyone working on our behalf to any party in connection with our business without receiving prior written approval from your Line Manager.

Similarly, no gift or offer of hospitality should be accepted by an employee or anyone working on our behalf without receiving prior written approval from your Line Manager.

## RECORD KEEPING

A record will be made of every instance in which gifts or hospitality are given or received.

As the law is constantly changing, this policy is subject to review and the college reserves the right to amend this policy without prior notice.

*Reviewed in September 2019.*

*Reviewed annually or more often as required*