South Lanarkshire College
East Kilbride

ANTI-BRIBERY POLICY

Version Number: 1.0

Document Information

Procedure Published/Created:	3 May 2022
Reviewed Date:	9 May 2022
Owner:	Head of Finance
Approved by:	
Equality Impact Assessment:	
Next Review Date:	May 2025

Version History

Version Number	Date	Author	Rationale
1.0	Creation	K McAllister	

Quick Links

We are inclusive and diverse, and this is one of our values.

We are committed to the FREDIE principles of Fairness, Respect, Equality, Diversity, Inclusion and Engagement.

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1. Introduction

South Lanarkshire College is committed to the highest standards of ethical conduct and integrity in its business activities in the UK and overseas. This policy outlines the College policy on preventing and prohibiting bribery, in accordance with the Bribery Act 2010. The College will not tolerate any form of bribery by, or of, its employees, agents or consultants or any person or body acting on its behalf. The Board of Management is committed to implementing effective measures to prevent, monitor and eliminate bribery.

2. Scope

This policy applies to members of the Board of Management, all employees and officers of the College, and to temporary workers, consultants, contractors, agents and subsidiaries acting for, or on behalf of, the College ("associated persons") within the UK and overseas. Every employee and associated person acting for, or on behalf of, the College is responsible for maintaining the highest standards of business conduct. Any breach of this policy is likely to constitute a serious disciplinary, contractual and criminal matter for the individual concerned and may cause serious damage to the reputation and standing of the College.

The College may also face criminal liability for unlawful actions taken by its employees or associated persons under the Bribery Act 2010. All employees and associated persons are required to familiarise themselves and comply with this policy, including any future updates that may be issued from time to time by the College.

3. Policy

It is the policy of the Board of Management:

- To endorse the Nine Key Principles of Public Life in Scotland (Appendix 1).
- To investigate fully any substantive allegation of a breach of relevant legislation.
- To ensure that allegations of unethical or illegal behaviour are dealt with expeditiously, consistently, fairly and within the requirements of The Public Interest Disclosure Act 1998.
- To ensure that all procurement is conducted prudently and honestly.
- To require the College to operate a system of financial record keeping and budgetary control capable of meeting both its own internal accounting needs and the need to demonstrate accountability for the use of public funds.
- To ensure that the risk of fraud and corruption is minimised.
- To ensure that Board members and employees of the College:
    - Are aware they are not entitled to retain any fees, commission or other benefits received in connection with the duties of an appointment;
    - Declare an interest on an annual basis if there is any personal, family, financial or other connection which may be thought to compromise the College and update this declaration should there be a material change during the course of the year;
    - Comply with the Public Interest Disclosure Policy/Whistle Blowing Policy if they have reason to suspect unethical or illegal behaviour by another person in the College (including the Board of Management);
    - Comply with the Gifts and Hospitality Policy

The Bribery Act 2010 imposes further obligations on the College. These obligations include the establishment of procedures which can be put into place to prevent bribery by persons associated with the College and the publication by the Board of its commitment to the Act.

In compliance with these statutory obligations, it is the policy of the Board of Management:

- To ensure that its members comply with the obligations imposed upon them by the Act and other relevant legislation.

- To retain responsibility for any decision making in relation to potential bribery issues.
- To foster and implement a culture of integrity where bribery is unacceptable.
- To communicate this policy to Board of Management members, employees, contractors, agents, students, partners, stakeholders, , other persons associated with the work of the College and the general public.
- To commit the College to carry out its work and business fairly, honestly and openly.
- To state its commitment to zero tolerance towards bribery publicly.
- To confirm the reputational, student and business benefits accruing from the rejection of bribery.
- To encourage transparent dialogue throughout the College so as to seek to ensure effective dissemination of ant-bribery policies and procedures to employees, students and all others who come into contact, or work, with the College.
- To ensure that the College provides effective training to Board members, its employees, which is continuous, and regularly monitored and evaluated, through education and awareness raising about the threats posed by bribery so as to firmly establish an anti-bribery culture.
- To ensure that those participating in training develop a firm understanding of what College policies and procedures mean in practice for them.
- To follow the best practice objective of avoiding doing business with others who do not commit to doing business without bribery.
- To remind all employees, contractors, agents, students and other persons associated with the College of the existing Public Interest - Whistle Blowing Policy.
- To remind all employees, contractors and suppliers that they are required to comply fully with all relevant legislation.
- To instruct the Principal and Chief Executive to establish appropriate procedures including the design, operation and monitoring of bribery prevention procedures and their regular review which demonstrate the Board's commitment to compliance with the Act.
- To instruct the Principal and Chief Executive to report routinely to the Board on College ant-bribery measures.
- To communicate to employees and students that breaching the antibribery policies and procedures and therefore the requirements of the Act will lead to appropriate disciplinary action and potential referral to the police.
- To endorse all bribery prevention related publications which are relevant to the operation of the College.

- To join with other colleges and Colleges Scotland in appropriate collective action against bribery.
- To keep under regular review the Board policy related on the Bribery Act 2010 and its bribery prevention procedures.

Appendix A

Public Service

You have a duty to act in the interests of the College and in accordance with the core activities of the College.

Selflessness

You have a duty to take decisions solely in terms of public interest. You must not act in order to gain financial or other material benefit for yourself, family or friends.

Integrity

You must not place yourself under any financial, or other, obligation to any individual organisation that might reasonably be thought to influence you in the performance of your duties.

Objectivity

You must make decisions solely on merit when carrying out public business.

Accountability

You are accountable for your decisions and actions to the public. You have a duty to consider issues on their merits, taking account of the views of others and must ensure that the College uses its resources prudently and in accordance with the law.

Openness

You have a duty to be as open as possible about your decisions and actions, giving reasons for your decisions and restricting information only when the wider public interest clearly demands.

Honesty

You have a duty to act honestly. You must declare any private interests relating to your public duties and take steps to resolve any conflicts arising in a way that protects the public interest.

Leadership

You have a duty to promote and support these principles by leadership and example, to maintain and strengthen the public's trust and confidence in the integrity of the College in conducting public business.

Respect

You should treat others fairly and equally in a courteous manner respecting the views of others.

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