



ANTI BRIBERY POLICY

1. PURPOSE

In accordance with the Bribery Act 2010 the College must have in place adequate procedures to prevent bribery occurring.

Definition of Bribery

The Bribery Act 2010 repealed previous corruption legislation and introduced the offences of offering and / or receiving a bribe. It also places specific responsibility on organisations to have in place sufficient and adequate procedures to prevent bribery and corruption taking place.

Bribery is defined as: Giving or receiving a financial or other advantage in connection with the improper performance of a position of trust, or a function that is expected to be performed impartially or in good faith.' (Bribery Act 2010)

Corruption is broadly defined as the offering of the acceptance of inducements, gifts or favours, payments or benefit in kind which may influence the improper action of any person; corruption does not always result in a loss. The corrupt person may not benefit directly from their deeds; however, they may be unreasonably using their position to give some advantage to another.

To demonstrate that the organisation has in place sufficient and adequate procedures and to demonstrate openness and transparency, all staff are required to comply with the requirements of the Anti-Bribery Policy.

Should members of staff wish to report any concerns or allegations they should contact the Head of Governance in accordance with the Whistleblowing Policy. It is expected that all staff members will lead by example in acting with the utmost integrity and ensuring adherence to all relevant regulations, policies and procedures.

The Bribery Act replaces the offences at common law and under the Public Bodies Corrupt Practices Act 1889, the Prevention of Corruption Act 1906 and the Prevention

of Corruption Act 1916 (known collectively as the Prevention of Corruption Acts 1889 to 1916) with new consolidated bribery legislation.

City of Wolverhampton College has a zero-tolerance approach to bribery and corruption and is committed to acting professionally, fairly and with integrity in all our dealings and relationships. The College's reputation with the community it serves and other stakeholders is underpinned by ethical behaviour, financial probity and honesty.

- The College aims to limit its exposure to bribery by: Setting out a clear anti-bribery policy, which is proportionate to the risks that the College is exposed to;
- Embedding awareness and understanding of the College's anti-bribery policy amongst all staff, "associated persons" (any person performing services for or on behalf of the College), and external persons/organisations with whom the College has commercial relations;
- Providing information and guidance to those working for us on how to recognise and deal with bribery and corruption issues.
- Training staff as appropriate so that they can recognise and avoid the use of bribery by themselves and others;
- Encouraging staff to be vigilant and to report any suspicion of bribery, providing them with suitable channels of communication (Please see the College's Whistleblowing/public interest disclosure procedures, the College's Anti-Fraud Policy, the Fraud Response Plan and the College's financial regulations) and ensuring sensitive information is treated appropriately;
- Rigorously investigating instances of alleged bribery in accordance with the College disciplinary procedure; and assisting the Police and other appropriate authorities in any resultant prosecution;
- Taking firm and vigorous action against any individual(s) involved in bribery

2. SCOPE

This policy applies to all individuals working at all levels and grades, including senior managers, governing body members, employees (whether permanent, fixed-term or temporary), consultants, contractors, trainees, seconded staff, homeworkers, casual workers and agency staff, volunteers, interns, agents sponsors or any other person associated with us, or any of our subsidiaries or their employees, wherever located (collectively referred to as 'Employees and Associated persons')

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All employees and associated persons are responsible for maintaining the highest standards of business conduct and are expected to behave honestly and with integrity. Any breach of this policy will constitute a serious disciplinary offence, which may lead to dismissal and may become a criminal matter for the individual.

3. OBJECTIVES

The College prohibits employees and associated persons from offering, giving, soliciting or accepting any bribe. The bribe might include cash, a gift or other inducement, to or from any person or organisation, wherever they are situated, and irrespective of whether or not they are a public official/body or private person or company, by any individual governor, employee, agent or other person or body acting on the College's behalf. The bribe might be made in order to:

- Gain any commercial, contractual or regulatory advantage for the College in a way which is unethical;
- Gain any personal advantage, pecuniary, or otherwise, for the individual or anyone connected with the individual.

4. GIFTS AND HOSPITALITY

This policy is not intended to prohibit appropriate corporate entertainment and/or hospitality undertaken in connection with the College's business activities, provided the activity is customary under the circumstances, is proportionate, and is properly recorded/disclosed to the College in accordance with its procedures as detailed in the College's Financial Regulations

5. YOUR RESPONSIBILITIES

Employees and associated persons are requested to remain vigilant in preventing, detecting and reporting bribery. Employees and associated persons are expected to report any concerns regarding any suspected bribery in accordance with the College's Whistleblowing Procedure. A copy of the College's Whistleblowing Policy is available on the College web site.

RELATED POLICIES AND PROCEDURES

- Financial Regulations and Procedures
- Whistleblowing/Public Interest Disclosure Policy
- Anti Fraud Policy

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- Fraud Response Plan
- Risk Management Policy and Procedure
- Staff Disciplinary Procedures
- Counter Fraud Strategy

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REVIEW OF POLICY

This policy will be reviewed every three years.

Date of next review: November 2026

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