

# LONGLEY PARK SIXTH FORM COLLEGE

## ANTI-BRIBERY POLICY

Originator:	Sharon Langridge, Clerk to the Corporation
Date of Last Approval:	Not applicable
Approval/review by:	Audit Committee May 2011
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# ANTI-BRIBERY POLICY

## 1. Introduction

The Bribery Act 2010 comes into force on 1<sup>st</sup> July 2011 and introduces an offence for organisations of 'failing to prevent bribery'. Under the Act organisations need to have in place adequate procedures to prevent bribery occurring if they are to avail themselves of the adequate procedures defence.

## 2. Policy Statement

Longley Park Sixth Form College values its reputation for ethical behaviour and for financial probity and reliability. It recognises that over and above the commission of any crime, any involvement in bribery will also reflect adversely on its image and reputation. Its aim therefore is to limit the College's exposure to bribery by:

- Setting out a clear anti-bribery policy;
- Encouraging its staff to be vigilant and to report any suspicions of bribery, providing them with suitable channels of communication and ensuring sensitive information is treated appropriately;
- Rigorously investigating instances of alleged bribery and assisting police and other appropriate authorities in any resultant prosecution;
- Taking firm and vigorous action against any individual(s) involved in bribery.

## 3. Scope

This Policy applies to Governors, co-opted members of committees, and all staff who work for the College.

**The College prohibits** the offering, the giving, the solicitation or the acceptance of any bribe, whether cash or other inducement **to or from** any person or company, wherever they are situated and whether they are a public official or body or private person or company **by** any individual employee, Board Member, agent or other person or body acting on the College's behalf **in order to** gain any commercial, contractual or regulatory advantage for the College in a way which is unethical **or in order to** gain any personal advantage, pecuniary or otherwise, for the individual or anyone connected with the individual.

## 4. Further Clarification

The College recognises that market practice varies across the areas in which it does business and what is normal and acceptable in one place may not be in another. This policy statement prohibits any inducement which results in a personal gain or advantage to the recipient or any person or body associated with them, and which is intended to influence them to take action which may not be solely in the interests of the College or of the person or body employing them or whom they represent.

This policy is not meant to prohibit the following practices providing they are customary in a particular market, are proportionate and are properly recorded:

- Normal and appropriate hospitality (further guidance is given in the College's Gifts and Hospitality Policy)
- The giving of a ceremonial gift on a festival or another special time
- The use of any recognised fast-track process which is available to all on payment of a fee
- The offer of resources to assist the person or body to make the decision more efficiently provided that they are supplied for that purpose only.

The College's Codes of conduct for Governors and Staff give details of the actions to be taken where they perceive fraudulent or corrupt acts are being perpetrated. Further guidance is contained in the College's Public Interest Disclosure Policy.

Inevitably, decisions as to what is acceptable may not always be easy. If anyone is in doubt as to whether a potential act constitutes bribery, the matter should be referred to your line manager. If necessary, guidance should also be sought from either the Assistant Principal (Resources) or the Clerk to the Corporation.

## **5. Staff and Governor Responsibility**

The prevention, detection and reporting of bribery is the responsibility of all staff and Governors throughout the College. Suitable channels of communication by which staff and others can report confidentially any suspicion of bribery will be maintained by the Public Interest Disclosure Policy.

## **6. Related Strategies and Policies**

The following other strategies and policies have been developed to demonstrate to all that the College will not tolerate any party who it either employs or works with entering into fraudulent or corrupt acts that would damage its reputation of financial standing:

- Anti-Fraud Policy and Fraud Response Plan
- Financial Regulations
- Public Interest Disclosure Policy
- Risk Management Policy and Procedures.

All of these documents are to be found on the College's website at [www.longleypark.ac.uk](http://www.longleypark.ac.uk)