



# **ANTI-BRIBERY AND CORRUPTION POLICY**

Document Title		
Anti-Bribery and Corruption Policy		
Document Author and Department:	Responsible Person and Department:	
Kathryn Edmonds (Administration) & Rowena Biddlecombe (Finance & HR)	Head of Finance	
Approving Body:	Date of Approval:	
Board of Trustees	19 <sup>th</sup> June 2024	
Date coming into force:	Review Date:	Edition No:
1 <sup>st</sup> September 2024	Annually	5
EITHER For Public Access? Tick as appropriate	OR For Internal Access only? Tick as appropriate	
YES <input checked="" type="checkbox"/>	YES <input type="checkbox"/>	
Summary/Description:		
This document sets out the details pertaining to All Nations Christian College anti-bribery practices		
Edition 1 14/06/2012 Edition 2 14/04/2016 Catrin Mezaour, Acting Finance Manager Edition 3: 29/4/16 Kathryn Edmonds BA Administrator Edition 4: 2022 major revision Kathryn Edmonds Edition 5: 12/6/2024 minor updates to document author names and mission statement		

# **ALL NATIONS CHRISTIAN COLLEGE**

To cultivate biblically rooted, hope-filled and culturally relevant engagement with God's mission by training and equipping disciples of Jesus Christ in partnership with the global church

## **ANTI-BRIBERY AND CORRUPTION POLICY**

### **1. CONTENTS OF POLICY**

1. Contents of Policy
2. Commitment
3. Legislative Framework
4. Aims and Scope
5. Definitions
6. Policy
7. Bribery Prevention
8. Procedures
9. Roles, Responsibilities, Policy Approval and Review
10. Policy Communication

### **2. COMMITMENT**

All Nations Christian College is committed to operating with the highest standards of integrity and promoting a culture in which accountability flourishes. The College opposes bribery as it damages good government and therefore operates a zero-tolerance policy towards the giving or receiving of bribes.

### **3. LEGISLATIVE FRAMEWORK**

All Nations Christian College practices are in accordance with the following regulations, policies and procedures:

- Bribery Act 2010
- MC006 Financial Authority Levels
- MC008 Staff Expenses
- All Nations Christian College Whistleblowing Policy
- All Nations Christian College Data Protection Policy
- All Nations Christian College Bullying, Harassment and Sexual Misconduct Policy
- All Nations Christian College Equality and Diversity Policy
- All nations Christian College Staff Handbook
- All Nations Christian College Student Disciplinary Policy
- All Nations Christian College Corporate Criminal Offence Policy

### **4. AIMS AND SCOPE**

This policy outlines the measures that All Nations Christian College takes to prevent bribery and the procedures to follow if bribery occurs. It aims to help the College establish a defence under section 7 of the Bribery Act and to minimise any operational and reputational risks associated with individuals giving or taking bribes on its behalf.

This policy applies to all employees, volunteers, Board members, and all people with whom it engages in business and legal relations.

## 5. DEFINITIONS

### 5.1. Bribery:

Bribery is the offering, promising, giving, accepting or soliciting of money, a gift or other advantage as an inducement to do something that is illegal or a breach of trust in the course of carrying out an organisation's activities. Examples of bribery may include:

- A potential supplier offering you some money or a gift in order to influence the tendering process
- A job applicant offering to pay you to increase his/her chance of being offered employment
- Offering a gift to a local government representative in return for approval of a planning application
- Offering payment to a government official in order to speed up or complete a process such as border/immigration control
- Offering a gift to a Course Tutor/Examiner in return for a good mark

It is illegal to give or receive a bribe under the Bribery Act and organisations are liable for bribes taken or given on their behalf where it does not have adequate procedures in place.

### 5.2. Facilitation payments:

A facilitation payment is a small bribe, also called a 'speed' or 'grease' payment, made to secure or expedite the performance of a routine or necessary action to which the payer has legal or other entitlement.

### 5.3. Gifts and hospitality:

These can range from small gifts to expensive hospitality (tickets for major events, holidays). *Hospitality that is proportionate and reasonable given the goods or services provided or reflecting your good relations is unlikely to constitute a bribe.* However, extravagant gifts and hospitality may be intended to disguise bribes to induce improper behaviour.

## 6. POLICY

- 6.1. This policy will apply in cases where you genuinely and in good faith believe that bribery and corruption is occurring, has occurred or may occur within the organisation:
- 6.2. Each case will be considered on its own merits
- 6.3. While it is not necessary that you prove the malpractice or misconduct that you are alleging, but may simply raise a reasonable suspicion, please note that you will not be protected from the consequences of making such a disclosure if, by doing so, you commit a criminal offence.
- 6.4. If you raise a malicious, vexatious or knowingly untrue allegation, then such a disclosure will constitute a disciplinary offence for the purposes of the College's Staff Disciplinary Policy and Procedures. It may also constitute gross misconduct for which summary dismissal is the sanction. Such a disclosure may leave you unprotected by the Public Interest Disclosure Act if it is considered inappropriate.
- 6.5. The College is committed to ensuring, as far as it is able, that a person making an allegation of bribery and corruption will not suffer victimisation from a co-worker as a result of doing so.
- 6.6. All investigations will be considered impartially. The College makes every effort, in accordance with its 'Equal Opportunities Policy' to ensure that staff are not unlawfully discriminated against because of the Equality Act 2010 'protected characteristics of age, disability, gender reassignment, pregnancy and maternity, marriage and civil partnership, race (including colour,

ethnic/national origin or nationality), religion or belief, sex (gender) and sexual orientation. We believe that diversity is a positive contribution to the learning experience at All Nations.

6.7. All complaints will be managed in a sensitive way and with due regard to data protection legislation and the College Data Protection Policy.

## **7. BRIBERY PREVENTION**

### **7.1. Top level commitment**

All Nations Christian College is committed to tackling bribery at the highest level. The College clearly articulates its zero-tolerance policy on bribery on its website.

### **7.2. Risk assessment**

The College assesses the organisation annually in consultation with the Finance and Resources Committee and the Senior Leadership Team and reviews the risks presented by bribery as part of this.

### **7.3. Due diligence**

### **7.4. Communication and training**

The College ensures that employees, volunteers, Board members, agents and service suppliers receive training on the College's anti-bribery policy enabling them to recognise and report instances of bribery appropriately.

### **7.5. Charitable Donations**

Employees, volunteers, Board members, agents, service suppliers and all people with whom it engages in business and legal relations should ensure that any donation received or made by the College is not an incentive to conduct its business improperly.

## **8. PROCEDURES**

### **8.1. What to do if you are offered a bribe**

Individuals should reject demands for or offers of bribes and All Nations Christian College's stance on bribery should be made clear. The only circumstance where payment might not necessarily be avoided is when health and security are seriously at risk.

### **8.2. Where bribery is suspected or where it occurs**

- To enable proper investigation, staff should record the details of any bribery or requested or attempted bribery as soon as possible after the event in the register held by the Administrative Assistant. Any instances of actual or potential bribery should be properly and promptly investigated by a **departmental manager/tutor**, the **Head of Finance & HR** or if appropriate, the **Principal/Chief Executive Officer** in accordance with the College's Whistleblowing Policy and Procedures.
- The objectives of an investigation should be to:
  - Confirm whether or not a bribe has taken place, and to identify who was responsible
  - Confirm whether internal controls and anti-bribery procedures have worked in practice.
  - Identify any improvements required to anti-bribery procedures. Depending on the findings of the investigation, subsequent action will be determined.
- This may involve disciplinary action against staff involved or external reporting to:

- A senior officer or director of another organisation if the person making the bribe is from our organisation
  - Local law/enforcement agencies if considered appropriate
  - Serious Fraud Office
  - Relevant government department
  - The Charity Commission if it is considered a “serious incident”
  - Transparency International UK
- See the procedure in the College’s Whistleblowing Policy for further details.

## 9. ROLES, RESPONSIBILITIES, POLICY APPROVAL AND REVIEW

**9.1. The Board of Trustees** has legal oversight and responsibility for all College policies, providing leadership and active support for them and being responsible for ensuring that:

- A legally compliant and fit for purpose anti-bribery and corruption policy is in place and approved by them.
- Satisfactory arrangements are made for its effective implementation, including the provision of resources.
- The Senior Leadership Team monitors, evaluates and periodically reviews this policy and recommends any changes to first the Finance and Resources Committee and then the Board of Trustees for approval.
- Investigations brought under the terms of this policy are managed satisfactorily by the Senior Leadership Team.
- Decision-making complies with all relevant legislation and regulatory bodies.
- They receive details from the Senior Leadership Team of reported incidents and outcomes of cases (particularly where a significant impact on someone has occurred or lessons need to be learned), or of a serious incident or one which could be of reputational risk to the College which should be reported to either the Office for Students and/or the Charity Commission.

**9.2. The Principal/CEO and Senior Leadership Team** are responsible for:

- The implementation and management of this policy; ensuring that procedures are implemented consistently and with clear lines of authority and actively and visibly leading the College’s anti-bribery and corruption policy and practice.
- Ensuring the principles of this policy are incorporated into all aspects of the College’s business practices
- Ensuring this policy is continually improved in consultation with students and staff.
- Monitoring, evaluating and periodically reviewing this policy and for obtaining approval from the Finance and Resources Committee and the Board of Trustees for any changes made.
- The management of investigations.
- Ensuring decision-making complies with all relevant regulatory bodies.
- Reporting details to the Board of Trustees of reported incidents of outcomes of cases (particularly where significant impact on someone has occurred or lessons need to be learned), or of a serious incident or of one which could be of reputational risk to the College.

**9.3. The Head of Finance** is responsible for ensuring that the principles of this policy are incorporated into all aspects of the College’s financial management including accounting, gifts, staff expenses and donations – and that these policies are continually improved in consultation with staff.

**9.4. Senior Leadership Team, Head of Finance and Departmental Heads** are responsible for liaising with one another to ensure any projects are properly planned and that the risks involved are assessed and managed in line with this policy.

**9.5. All individuals across the College** are responsible for:

- familiarising themselves with this policy on appointment/at induction/orientation;
- demonstrating an active commitment to this policy by:
  - treating others with integrity

- reporting all bribery that they become aware of via the procedures laid out in this policy.
- not giving or receiving bribes
- challenging instances where bribery may occur and generally discouraging any form of corrupt behaviour by making it clear that such behaviour is unacceptable.
- **if involved in an investigation**, whether those making an allegation or those being accused of corrupt practice according to the terms of this policy:
  - ensuring they present their case with integrity and in a timely fashion and/or
  - ensuring they comply with any investigation and the procedures in this policy.

**9.6.** The HR Lead is responsible for managing the administration of any investigation process.

## **10. POLICY COMMUNICATION**

**10.1.** This document can be found in the student area on the College VLE and on the College website: [www.allnations.ac.uk](http://www.allnations.ac.uk).

**10.2.** The Administrative Assistant will make every effort to respond to any request to provide this policy in a different format. Such requests should be sent to [info@allnations.ac.uk](mailto:info@allnations.ac.uk).

**10.3.** This policy will be included in staff and student induction.