



# **ANTI-BRIBERY AND CORRUPTION POLICY 2021**

Document Title		
ANTI-BRIBERY AND CORRUPTION POLICY		
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Summary/Description:		
<p>This document sets out how All Nations Christian College provides protection from dismissal or any detriment to workers who, in good faith “blow the whistle” on certain specified activities.</p>		
<p><i>This document has been adapted from a toolkit by HRBird for the Charity Sector, with grateful acknowledgment.</i></p>		
<p>Reviewed August 2021 – minor terminology amendments</p>		

# ALL NATIONS CHRISTIAN COLLEGE

To train and equip men and women for effective participation in God's mission to His multicultural world.

## ANTI-BRIBERY AND CORRUPTION POLICY

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### 2 INTRODUCTION

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.

### 3 LEGISLATIVE FRAMEWORK

This policy has been written in accordance with the following laws, regulations, policies and procedures. This list is not exhaustive:

- Bribery Act 2010
- MC006 Financial Authority Levels
- MC008 Staff Expenses
- All Nations Christian College Whistleblowing Policy and Procedure
- All Nations Christian College [Data Protection Policy and Fair Processing Notice](#)
- All Nations Christian College [Equal Opportunities Policy](#)
- All Nations Christian College Staff Handbook and Appendices

### 4 SCOPE

This policy applies to all employees, volunteers, voluntary workers, Board members, agents and service suppliers working with College.

## 5 DEFINITIONS

**5.1. 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

**5.2. FACILITATION PAYMENTS** are payments which induce officials to perform routine functions they are otherwise obligated to perform. Facilitation payments are bribes and there is no exemption for them under the Bribery Act.

**5.3. GIFTS AND HOSPITALITY** 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.** The College is committed to operating with the highest standards of integrity and promoting a culture in which accountability flourishes.

**6.2.** The College opposes bribery as it damages good government and therefore operates a zero-tolerance policy towards the giving or receiving of bribes.

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

**6.4.** The College will assess the organisation annually in consultation with the Finance Committee and the Senior Leadership Team and review the risks presented by bribery as part of this.

**6.5.** The College will ensure that employees, volunteers, voluntary workers, Trustees, agents and service suppliers receive training on the College's anti-bribery policy enabling them to recognise and report instances of bribery appropriately.

**6.6.** The College expects employees, volunteers, voluntary workers, Trustees, agents and service suppliers to ensure that any donation received or made by the College is not an incentive to conduct its business improperly.

## 7 PROCEDURES

- 7.1. If individuals are offered a bribe they should reject demands for or offers of bribes and the College's stance should be made clear. The only circumstance where payment might not necessarily be avoided is when health and security are seriously at risk.
- 7.2. 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 Office Administrator.
- 7.3. Any instances of actual or potential bribery should be properly and promptly investigated by a departmental manager, the Finance Manager or if appropriate, the Chief Executive Director in accordance with the College's Whistleblowing Policy and Procedures.
- 7.4. Reference should be made to the College's Whistleblowing Policy for further details.
- 7.5. 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.
- 7.6. Such action 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

## 8 RESPONSIBILITIES, POLICY APPROVAL AND UPDATING

- 8.1. The College entrusts all individuals across the organisation to take a pro-active role in improving the organisation's anti-bribery policy and practice.

- **Board of Trustees**

The Board will provide leadership, resources and active support for the implementation of this policy. They are responsible for ensuring that this policy is fit for purpose and complied with.

- **Principal/CEO**

The Principal/CEO is responsible for ensuring that these policies and procedures are implemented consistently and with clear lines of authority. The Principal/CEO and Senior Leadership Team will actively and visibly lead the organisation's anti-bribery policy and practice.

- **Senior Leadership Team**

The Senior Leadership Team is responsible for ensuring that the spirit of this policy is incorporated into all aspects of the College's people management including recruitment, promotion, training, performance evaluation, remuneration and reward – and that these policies are continually improved in consultation with staff.

- **Finance**

Finance is responsible for ensuring that the spirit of this policy is incorporated into all aspects of the College's finance management including accounting, gifts, staff expenses and donations – and that these policies are continually improved in consultation with staff.

- **Departmental managers**

Departmental Managers are responsible for ensuring that their projects are properly planned and that the risks involved are assessed and managed in line with this policy.

- **Individuals**

Individuals are responsible for reporting all bribery that they become aware of via the procedures laid out in this policy. They are responsible for not giving or receiving bribes and challenging instances where bribery may occur.

**8.2.** This document, as well as all other policy, procedure and guidance documents relating to members of the College community will be available to all, monitored regularly and reviewed and evaluated periodically.

**8.3.** Those in positions of authority, such as the Board of Trustees, the Principal/CEO, Programme Leaders and Members of the Senior Leadership Team have formal responsibilities under this Policy and are expected to familiarise themselves with this Policy and procedure document on appointment.

**8.4.** The Senior Leadership Team and the Board of Trustees have overall responsibility for this policy including its approval, monitoring and annual review.

**8.5.** The Principal/CEO also has responsibility for overseeing any complaints brought under the terms of the policy and ensuring that decision-making complies with all relevant regulatory bodies.

## **9 POLICY COMMUNICATION**

**9.1.** This policy can be found in the Staff Handbook Appendices which is obtainable from the College Administrator, Jillian Walker.

**9.2.** The Staff Disciplinary Procedure can be found in the Staff Handbook Appendices which is obtainable from the College Administrator, Jillian Walker.

**9.3.** The College Administrator 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)

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

## **ANTIBRIBERY MONITORING FORM (see overleaf)**

**ALL NATIONS CHRISTIAN COLLEGE**  
**ANTIBRIBERY AND CORRUPTION MONITORING FORM**

Number of complaints received raised at College since last meeting	
If a complaint has been lodged: Nature of Complaint: (informal or formal):	Date complaint logged:
Description of Complaint:	
College response:	
Action to be considered to mitigate future risk?	
Any staff training to be implemented?	
Is the Board of Trustees satisfied the College is compliant with the relevant legislation regarding whistleblowing?	