



ANTI-BRIBERY AND CORRUPTION POLICY

Policy review area	Staff
Lead manager	Chief Executive Officer and Principal
Approval level	Board of Directors
Start date	March 2022 (ed. June 2025)
Review cycle	1 year
Next review	June 2026

INTRODUCTION

1. Acquire Learning College has a zero-tolerance for bribery and corruption. 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:
 - a. Setting out a clear anti-bribery policy, which is proportionate to the risks that the College is exposed to.
 - b. 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.
 - c. Training staff as appropriate so that they can recognise and avoid the use of bribery by themselves and others.
 - d. Encouraging staff to be vigilant and to report any suspicion of bribery, providing them with suitable channels of communication and ensuring sensitive information is treated appropriately.
 - e. 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.
 - f. Taking firm and vigorous action against any individual(s) involved in bribery.

THE POLICY

2. This policy applies to all employees and anyone acting for, or on behalf of, the College ("associated persons"), including Directors, other volunteers, temporary workers, consultants, and contractors, regardless of the nine protected characteristics as shown below:
 - a. Age
 - b. Disability
 - c. Gender reassignment
 - d. Marriage and civil partnership
 - e. Pregnancy and maternity
 - f. Race
 - g. Religion and belief
 - h. Sex
 - i. Sexual orientation
3. 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.
 - a. Offering, promising, giving or requesting, agreeing to receive, or accepting any financial or other advantages that induce the recipient or any other person to act improperly in the performance of their functions; or
 - b. to reward them for acting improperly;
 - c. where the recipient would act improperly by accepting the advantage; or
 - d. the offering, promising, or giving of a bribe to a foreign public official to influence the recipient in the performance of the public official's functions, to obtain or retain business or a business advantage.

4. An advantage includes money, gifts, loans, fees, hospitality, services, discounts, the award of a contract or anything else of value. A person acts improperly when they;
 - a. act illegally, unethically, contrary to an expectation of good faith or impartiality; or
 - b. abuse a position of trust.

The improper acts may be related to any business or professional activities, public functions, acts in the course of employment, or other activities by or on behalf of any organisation.

5. The following are examples of bribery, but the list is not exhaustive:
 - a. offering excessive hospitality to secure a commercial project or grant;
 - b. offering excessive hospitality to secure a commercial project or grant;
 - c. receiving concert tickets on the understanding that an individual will, as a result, commission business or award or renew an existing contract;
 - d. offering a partner of a member of staff a free long-haul flight to ensure a tender bid receives preferential treatment;
 - e. using an overseas intermediary to pay a suggested 'fee' for expedited approval by a foreign official of a proposed programme is run locally by the College; or
 - f. receiving a substantial donation offered to the College for a project by the relative of a rejected applicant should there be a reversal of the decision.
6. 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. 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 procedures.

Action Taken Following Reports of Alleged Bribery

7. Engagement in bribery or breach of this Policy, including failure to report bribery related concerns, may require investigation and action taken under the College's Disciplinary Procedure, in addition to any criminal investigation. The College will investigate allegations of bribery raised by employees or others.

Freedom of Information and Data Protection

8. The information recorded in the College's gifts and hospitality registers is potentially subject to disclosure in response to requests under the Freedom of Information Act 2000. The College will consider whether any relevant exemptions to disclosure apply before responding to requests. Processing personal data provided in compliance with this Policy and procedures follow the requirements of the UK GDPR and Data Protection Act 2018.

Training and Communication

9. Training and briefing are essential in implementing the Policy. The College will provide training to all staff as part of its mandatory training and induction. There will be targeting of training where risk assessments suggest knowledge of how to comply with the Bribery Act needs enhancing. The College will provide anti-bribery training in sensitive areas with a potential risk of staff facing bribery or corruption during work activities. There will be proportionate accompanying procedures and guidance to assist implementation of this Policy. The objective is to make the guidelines clear, practical, and accessible to ensure effective implementation and enforcement of the Policy. They will help to assess the risks, taking account of the nature, scale and complexity of the activities involved.

RELATED POLICIES

Fraud Prevention Policy

Whistleblowing Policy