Glasgow Kelvin College

Anti-Bribery Policy Statement

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The Board of Management (or any person/group with delegated authority from the Board) reserves the right to amend this document at any time should the need arise following consultation with employee representatives. This Policy has been subject to an Equality Impact Assessment, which is published on our website: https://www.glasgowkelvin.ac.uk/equality-diversity/.

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1. Introduction

This document sets out Glasgow Kelvin College's policy in respect of bribery or alleged/suspected bribery and how any such instances should be raised and or managed.

2. Scope

This policy applies to all employees of the College and anyone acting for, or on behalf of the College such as Board Members, Volunteers, Temporary Workers, and Contractors (list not exhaustive).

3. Principles

Glasgow Kelvin College conducts all of its business in an honest and ethical manner and, as such, has a zero-tolerance approach to bribery and corruption. We are committed to acting professionally, fairly and with integrity in all our business dealings and relationships and will implement effective systems to counter bribery and corruption.

4. Policy Statement

It is the existing policy of the Board of Management:

- To endorse the Nine Key Principles of Public Life in Scotland – refer to Appendix 1.
- To investigate fully any substantive allegation of a breach of relevant legislation.
- To ensure that allegations of unethical or illegal behaviour are dealt with expeditiously, consistently, fairly and within the requirements of The Public Interest Disclosure Act 1998.
- To ensure that all procurement is conducted prudently and honestly.
- To require the College to operate a system of financial record keeping and budgetary control capable of meeting both the College's own internal accounting needs and the need to demonstrate accountability for the use of public funds.
- To ensure that the risk of fraud and corruption is minimised.
- To ensure that employees of the College:
    - are aware they are not entitled to retain any fees, commission etc received in connection with the duties of an appointment;
    - declare an interest (if a budget holder) on an annual basis if there is any personal, family, financial or other connection [directly or indirectly] which may be thought to compromise the College;
    - comply with the Public Interest Disclosure Policy/Whistle Blowing Policy if they have reason to suspect unethical or illegal behaviour by another person in the College (including the Board of Management);
    - comply with the Gifts and Hospitality Policy.

The Bribery Act 2010 imposes further obligations on the College. These obligations include the establishment of procedures which can be put into place to prevent bribery by persons associated with the College and the publication by the Board of its commitment to the Act.

In compliance with those obligations, it is the policy of the Board of Management in relation to the Act:

- To ensure that its members comply with the obligations imposed upon them by the Act and other relevant legislation.
- To retain responsibility for any decision making in relation to critical bribery issues.
- To foster a culture of integrity where bribery is unacceptable.
- To communicate this policy to the College's employees, contractors, agents, students, partners, stakeholders, Board of Management members[1], other persons associated with it and the general public.
- To commit the College to carry out its work and business fairly, honestly and openly.
- To publicly state its commitment to zero tolerance towards bribery.
- To confirm the reputational, student and business benefits accruing from the rejection of bribery.
- To encourage transparent dialogue throughout the College so as to seek to ensure effective dissemination of ant-bribery policies and procedures to employees, students and all others who come into contact, or work, with the College.
- To ensure that the College provides effective training to its employees, which is continuous, and regularly monitored and evaluated, through education and awareness raising about the threats posed by bribery so as to firmly establish an anti-bribery culture.
- To ensure that those participating in training develop a firm understanding of what the College's policies and procedures mean in practice for them.
- To follow the best practice objective of avoiding doing business with others who do not commit to doing business without bribery.
- To remind all employees, contractors, agents, students and other persons associated with the College of the existing Public Interest - Whistle Blowing Policy.
- To remind all employees, contractors and suppliers that they are required to comply fully with all relevant legislation.
- To instruct the Principal and Chief Executive to establish appropriate procedures including the design, operation and monitoring of bribery prevention procedures and their regular review which demonstrate the College's commitment to compliance with the Act.
- To instruct the Principal and Chief Executive to report regularly to the Board of Management – Audit and Risk Committee on the College's ant-bribery measures.

[1] It should be noted that Board members are also charity trustees and any reference to Board members in College policy documents also refers to that role.

- To communicate to employees and students that breaching the anti-bribery policies and procedures and therefore the requirements of the Act will lead to appropriate disciplinary action in the interests of the College.
- To endorse all bribery prevention related publications which are relevant to the operation of the College.
- To join with other Colleges and Colleges Scotland in appropriate collective action against bribery.
- To keep under regular review the Board's Policy on the Bribery Act 2010 and the College's bribery prevention procedures.

5. Monitoring and Review

The content of this Policy Statement will be routinely monitored, and reviewed every three years or as operational requirements, legislation etc. dictates.

6. Related Policies and Procedures

- Code of Conduct for Board of Management
- Conflict of Interest Policy
- Register of Interests
- Financial Regulations
- Ethos and Values Framework
- Gifts and Hospitality Policy
- Public Interest Disclosure Whistle-Blowing Policy and Procedure
- Scheme of Delegation
- Standing Orders

Appendix

Public Service
You have a duty to act in the interests of the College and in accordance with the core activities of the College.

Selflessness
You have a duty to take decisions solely in terms of public interest. You must not act in order to gain financial or other material benefit for yourself, family or friends.

Integrity
You must not place yourself under any financial, or other, obligation to any individual organisation that might reasonably be thought to influence you in the performance of your duties.

Objectivity
You must make decisions solely on merit when carrying out public business.

Accountability
You are accountable for your decisions and actions to the public. You have a duty to consider issues on their merits, taking account of the views of others and must ensure that the College uses its resources prudently and in accordance with the law.

Openness
You have a duty to be as open as possible about your decisions and actions, giving reasons for your decisions and restricting information only when the wider public interest clearly demands.

Honesty
You have a duty to act honestly. You must declare any private interests relating to your public duties and take steps to resolve any conflicts arising in a way that protects the public interest.

Leadership
You have a duty to promote and support these principles by leadership and example, to maintain and strengthen the public's trust and confidence in the integrity of the College in conducting public business.

Respect
You should treat others fairly and equally in a courteous manner respecting the views of others.