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| Anti Bribery Policy | | | |
| Current Status: | Operational | Last Review: | May 2024 |
| Policy Owner: | CFO | Next Review: | May 2026 |
| Roles Responsible for Review: | Group Head of Finance | Originated: | Oct 2021 |
| Approved by: | SET Operations | Committee: | Audit and Risk Committee |
| Type of Policy: | Staff / Governors / External | Quality Assured by: | Policy Team |

1. Introduction

- 1.1. This policy applies to all staff and any other personnel associated with Eastern Education Group (EEG) (at each relevant College including West Suffolk College, Abbeygate Sixth Form College, and One Sixth Form College).
- 1.2. This document sets out EEG’s policy and advice to all Governors, Officials and employees of the Colleges (in this Policy collectively referred to as “Staff”) in dealing with bribery, alleged bribery or suspected bribery. It details the arrangements made for the Colleges for such concerns to be raised by employees or members of the public and defines the actions to be taken in response.
- 1.3. The Bribery Act 2010 (“the Act”) introduces a new, clearer regime for tackling bribery that applies to all organisations and their employees and representatives based in/or operating in the UK. It covers all forms of bribery, the offering and receiving of a bribe, directly or indirectly, whether or not it involves a public official, in the UK or abroad. There are offences by individuals (and a corporate offence for corporations and partnerships). Penalties for non-compliance are serious.
- 1.4. Bribery is a criminal offence for both individuals and organisations and can be punished with imprisonment of up to 10 years or unlimited fines. If a member of staff was accused of bribery, EEG’s reputation might be damaged considerably, and subsequent enforcement action will be time-consuming and hinder the College from focussing on its core business and service delivery.
- 1.5. As an organisation relying largely on public funds, EEG has additional responsibilities to ensure that Staff adopt and adhere to the principles and values identified by the Nolan Committee on standards of holders of public office. The Seven Nolan Principles of Public Life: are set out in full in the Corporation’s Code of Conduct and the Code of Conduct procedure for Staff.
- 1.6. EEG therefore has legal, reputational, and moral responsibilities to prohibit any form of bribery. The policy applies to EEG and its Staff, independently of their grade and position, and shall be respected at all times.

- 1.7. This policy shall be read in conjunction with all other EEG policies, procedures and regulations including the Code of Conduct for Staff.
- 1.8. EEG will seek to ensure that a comprehensive anti-bribery culture exists throughout all Colleges via the role of the Chief Financial Officer and through internal audit activities.

2. Scope

- 2.1. This policy relates to all forms of bribery and is intended to provide direction and help to Staff who may identify alleged or suspected bribery. The overall aims of this policy are to:
 - i. improve the knowledge and understanding of everyone at EEG, irrespective of their position, about the risk of bribery within the organisation and its unacceptability;
 - ii. assist in promoting a climate of openness and a culture and environment where Staff feel able to raise concerns sensibly and responsibly;
 - iii. set out EEG's responsibilities in terms of the deterrence, prevention, detection and investigation of bribery and corruption;
 - iv. ensure the appropriate sanctions are considered following an investigation, which may include any or all of the following: - criminal proceedings - civil proceedings - internal/external disciplinary action (including reporting to professional / regulatory bodies)
- 2.2. This policy applies to Staff, regardless of position held, and also to consultants, vendors, contractors, and/or any other parties who have a business relationship with each College. It will be brought to the attention of Staff through training and will form part of the induction process for new staff. It is the duty of all of the above to report any concerns they may have concerning bribery.
- 2.3. In implementing this policy, managers must ensure that Staff are treated fairly and within the provisions and spirit of the College's [Equality, Diversity and Inclusion Policy](#) Special attention should be paid to ensuring the policy is understood where there may be barriers to understanding caused by the individual's circumstances, where the individual's literacy or use of English is weak, or where the individual has little experience of working life.

3. Policy

- 3.1. EEG will not engage in or tolerate any form of bribery or corruption and each member of Staff has a personal responsibility to protect the Colleges from bribery or corruption.
- 3.2. EEG is committed to the prevention of bribery within the Colleges and by any person acting on behalf of each College, to the rigorous investigation of any

such allegations and to taking appropriate action against wrong doers.

- 3.3 Off-the-book accounts and false or deceptive bookkeeping entries are strictly prohibited. All gifts, payments or any other contribution received by or on behalf of all Colleges whether in cash or in kind (other than gifts of token value specifically permitted under the terms of section 8 of the Code of Conduct for Staff), shall be documented, regularly reviewed, and properly accounted for in the books of EEG. The record retention and archival policy must be consistent with the College's accounting standards, tax and other applicable laws and regulations.
- 3.4 EEG will procure all goods and services transparently with the level of service, quality, price and value for money determining the successful supplier/contractor, not by receiving (or offering) improper benefits.
- 3.5 No member of Staff shall request or receive a bribe from anybody, nor imply that such an act might be considered. This means that they will not agree to receive or accept a financial or other advantage from a former, current or future client, business partner, contractor or supplier or any other person as an incentive or reward to perform their function or activities improperly.
- 3.6 Offering or making a bribe is absolutely prohibited. No member of Staff shall offer or promise, a reward in any way or give a financial or other advantage to any person in order to induce that person to perform his/her function or activities improperly. It does not matter whether the other person is a UK or foreign public official, political candidate, party official, private individual, private or public sector employee or any other person (including creating the appearance of an effort to improperly influence another person).
- 3.7 From time to time the College may adopt policies which provide bona fide Students of EEG with financial or other incentives to achieve their course successfully. Examples include educational or travel allowances tied to attendance, and opportunities to take part in extra curricula activities tied to good course performance. For the avoidance of doubt such policies shall not constitute bribery provided that it is reasonable and proportionate.
- 3.8 The use of any agent or other intermediary for the purpose of committing acts of bribery is prohibited.
- 3.9 All intermediaries shall be selected with care, and all agreements with agents and other intermediaries shall be concluded under terms that comply with this Policy. EEG will contractually require its agents and other intermediaries to comply with this Policy and to keep proper books and records available for inspection by appointed auditors or investigating authorities.
- 3.10 Agreements with agents and other intermediaries shall at all times provide for the necessary contractual mechanisms to enforce compliance with the anti-bribery regime. In cases of non-compliance, the College will require the

correction of deficiencies, apply sanctions, and/or terminate the agreement.

- 3.11 Staff should be aware that bribery will normally be regarded as gross misconduct resulting in summary dismissal without previous warnings, in accordance with the College's disciplinary, grievance and capabilities procedures.

4. Gifts and Hospitality

- 4.1 EEG only permits and accepts corporate entertainment, gifts, hospitality and promotional expenditure that is undertaken:

- For the purpose of establishing or maintaining good business relationships;
- To improve the image and reputation of the College; or
- To present the College's activities effectively;

Provided that it is arranged in good faith, and is not offered, promised or accepted to secure an advantage for any College or any of its staff or associated persons or to influence the impartiality of the recipient. Gifts and Hospitality are subject to Line Management authorisation and this must be sought prior to staff accepting the offer. Regular acceptance of gifts and hospitality will be discouraged.

- 4.2 Hospitality or similar business expenditure that is reasonable and proportionate is acceptable as are invitations and/or acceptance to attend events or other hospitality that may be extended or accepted as a reflection of good relations, provided that such activity is demonstrably reasonable and proportionate to support the activities of each College.
- 4.3 Staff may receive an inexpensive gift of token value provided that it is both offered and accepted within the spirit of this Policy. A register of gifts and hospitality received where the value is in excess of £50 will be maintained by the Finance department.
- 4.4 Staff, in particular teaching staff, may receive tokens of thanks from individual or groups of students for a course well taught or for particular support during the course that has helped them to be successful. This is common practice and should be understood to be outside of this policy. Staff cannot however receive gifts that could in any way be considered as a bribe to improperly influence the outcome of students studies e.g. in the marking and assessment of examinations and coursework or progression of a student to another course etc.
- 4.5 Staff in receipt of gifts or hospitality where the value is in excess of £50 should notify the Chief Financial Officer (CFO) or Head of Finance (HoF) with details of the gift. If the value of the gift or hospitality is not easily determined, staff

should disclose the details to the CFO or HoF so that an assessment of value can be made and an entry made in the register if required. Gifts or Hospitality received where the value is below £50 do not need to be disclosed. Staff are reminded of the requirement in 4.1 to obtain line management authorisation before gifts or hospitality are received and to avoid accepting gifts or hospitality on a regular basis.

5. Facilitation Payments

- 5.1 Facilitation payments are small payments made to secure or expedite the performance of a routine action by a government official or agency (e.g. issuing licences or permits, installation of a telephone line, processing goods through customs etc.) to which the payer (or the company) has legal or other entitlement.
- 5.2 Facilitation payments are prohibited under the Bribery Act. They shall not be made by EEG or any member of Staff.

6. Political and Charitable Contributions

- 6.1 EEG will not make any contributions to politicians, political parties or election campaigns. For the avoidance of doubt, payments of subscriptions to properly constituted independent representative bodies (for example the Association of Colleges) are deemed not to be a political contribution and are therefore permissible.
- 6.2 As a responsible Public Organisation, EEG may make charitable donations. However, these payments shall not be provided to any organisation upon the suggestion of any person in order to induce that person to perform improperly the function or activities which he or she is expected to perform in good faith, impartially or in a position of trust or to reward that person for the improper performance of such function or activities.
- 6.3 Any donations and contributions must be ethical and transparent. The recipient's identity and planned use of the donation must be clear, and the reason and purpose for the donation must be justifiable and documented. Donations to organisations (other than charities), to individuals, or donations paid to private accounts are prohibited.
- 6.5 In the event that Staff and/or students wish to organise fundraising events and seek endorsement by EEG such endorsement will be subject to the prior approval of the Chief Financial Officer who must be satisfied that the terms of this policy are implemented and that there is no risk of fundraising for inappropriate causes.

7. Sponsoring

- 7.1 Sponsoring by EEG means any contribution in money or in kind towards an

event organised by a third party in return for the opportunity to raise the Group profile. Government Funding will not be used for sponsorship activities. All sponsoring contributions must be transparent, for legitimate business purposes, and proportionate to the consideration offered by the event host. They may not be made towards events organised by individuals or organisations that have goals incompatible with EEG's ethical standards or that would damage the reputation of the Group. All sponsorships will be publicly disclosed and shall be subject to prior approval by the Chief Financial Officer.

- 7.2 Where sponsorship is received to fund EEG training events, training materials and general meetings, the sponsorship must be transparent, pursuant to a written agreement, for legitimate business purposes, and proportionate to the occasion. Where meetings are sponsored by external sources, that fact must be disclosed in the papers relating to the meeting and in any published minutes/proceedings. All proposed sponsorships of the College shall be subject to prior approval by the Chief Financial Officer.

8. Reporting Suspected Offences

- 8.1 EEG will encourage anyone having reasonable suspicions of bribery to report them in accordance with the College's Policy for [Disclosure on Matters of Public Interest \(Whistle Blowing\)](#). No individual will suffer any detrimental treatment as a result of reporting reasonably held suspicions.
- 8.2 Any unfounded or malicious allegations will be subject to disciplinary action.

9. Monitoring the Effectiveness of the Policy

- 9.1 This policy will be reviewed by the Chief Financial Officer annually or as legislation requires.

10. Definitions

- 10.1 Bribery - "Inducement for an action which is illegal, unethical or a breach of trust. Inducements can take the form of gifts, loans, fees, rewards or other advantages".
- 10.2 Corruption - This can be broadly defined as the offering or acceptance of inducements, gifts, favours, payment or benefit-in-kind which may influence the action of any person. Corruption does not always result in a loss. The corrupt person may not benefit directly from their deeds; however, they may be unreasonably using their position to give some advantage to another.

Revision History – Policy name

| Revision date | Reason for revision | Section number | Changes made |
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| May 2024 | Review | All sections | Reviewed and re-formatted to EEG Standard from WSC Policy |
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