

UNITED COLLEGES GROUP

ANTI-BRIBERY, GIFT AND HOSPITALITY POLICY

Summary

This document sets out United Colleges Group's policy on anti-bribery, and on the receipt of gifts and hospitality by staff and any associated persons on behalf of the Group.

Policy Owner:	Director of Governance
Date of last approval:	October 2019
Approval / Review Body:	Corporation (via Audit Committee)
Frequency of Review:	3 years
Date / status of this issue:	<i>October 2019</i>

Anti-Bribery, Gifts and Hospitality Policy

Introduction

1. United Colleges Group (“the Group”) has zero tolerance for bribery and corruption. The Group’s reputation with the community it serves and wider stakeholders is underpinned by ethical behaviour, financial probity and honesty. The Group aims to limit its exposure to bribery by:
 - Setting out a clear anti-bribery policy, which is proportionate to the risks the Group is exposed to;
 - Embed awareness and understanding of the Group’s anti-bribery policy amongst staff, associated persons (this refers to any person performing services on behalf of the Group and would include staff, governors, other volunteers, temporary workers, consultants and contractors) and external persons/ organisations which whom the Group has commercial relations.
 - Training staff so that they can recognise and avoid the use of bribery by themselves or others.
 - Encourage staff to be vigilant and to report any suspicion of bribery via the procedures of the Public Disclosure/ Whistleblowing Policy;
 - Rigorously investigate any instances of alleged bribery in accordance with the Group’s disciplinary procedures, and assist the police and relevant authorities in any resultant action.

Anti-Bribery Policy

2. This policy applies to all staff, and associated persons of the Group. This would include governors, other volunteers, temporary and casual workers, consultants and contractors.
3. All staff 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 criminal proceedings.
4. The Group prohibits staff and associated persons from offering, giving, soliciting or accepting a bribe. The bribe might include cash, a gift or other inducement, to or from any persons or organisation, wherever they are situated, irrespective of whether they are a public official body, a private person or company, by a member of staff or associated person. The bribe may be made in order to:
 - Gain commercial, contractual or regulatory advantage for the Group in a way which is unethical
 - Gain any personal advantage, pecuniary or otherwise, for the individual or anyone connected with the individual
5. The anti-bribery policy is not intended to prohibit appropriate corporate entertainment and or hospitality undertaken in connection with the Group’s business activities, provided that the activity is customary under the circumstances, proportionate and is properly disclosed in accordance with procedures for gifts and hospitality set out below.
6. Staff and associated persons are requested to remain vigilant in preventing, detecting and reporting bribery to the Director of Governance via the Public Interest Disclosure Policy

(Whistleblowing).

Gifts and Hospitality

7. The Group's position on the receipt of gifts and hospitality by any of its staff or associated persons from any third parties is set out below. This policy aims to ensure that no staff or associated persons are conflicted in respect to any acceptance of gifts and hospitality, and are protected from accusations of bribery.

Gifts and Hospitality Policy

8. All staff and associated persons may NOT receive gratuities with a value in excess of £25 from third parties without first seeking the approval of the CEO, and advising the Director of Governance of the gratuity so that it can be recorded on the Gifts and Hospitality Register which the Director of Governance will maintain. The Director of Governance may refer the acceptance of the gift or hospitality to the relevant Committee Chair or to the Chair to the Corporation. It may be advised by the Director of Governance that the gift is not accepted or be returned.
9. For the avoidance of doubt, all offers of gratuities with a value in excess of £25 must be referred to the Director of Governance for recording on the Gifts and Hospitality Register irrespective of whether they are accepted or not.
10. Any gift or donation which is offered to the Group with conditions which could incur the added expenditure in the current or future years must be referred to the Chief Finance Officer before it is accepted.
11. Governors, in accordance with the Conflicts of Interests Policy are responsible for declaring any interests, financial or otherwise, which may be perceived as having the potential to influence their judgment. These are recorded on the Register of Interests by the Director of Governance. Governors are required to complete a conflict of interests form annually.
12. The Register of Interests and Gifts and Hospitality Register is available on request from the Director of Governance for public inspection.

Hospitality

13. The Group may provide hospitality in connection with its business affairs to staff, governors and business visitors. The budget for hospitality will be determined by the CEO and will be subject to the budget setting and approval processes.
14. Modest hospitality is an accepted courtesy of a business relationship. However, staff should be cautious in accepting hospitality from suppliers or contractors so as to avoid the position where they might appear to be influenced in making a decision based on such hospitality. Hospitality should be restricted to a level that would normally be reciprocated by the Group, such as an occasional meal.
15. Hospitality should not be accepted from any organisation that is responding to a tender.

Examples of Gifts/ Hospitality

16. The following are examples of acceptable gifts / hospitality:
 - Occasional lunches/ dinners which are received as part of normal business (for example as part of a training course)
 - Receipt of small items from suppliers or contractors as expressions of gratitude such as boxes of chocolates, bottles of drink (valued at less than £25)

- Incidental items such as stationery, calendars, pens as advertising materials

17. Any items not falling within the above should be notified to the Director of Governance.

Responsibilities

18. It is the responsibility of all staff and associated persons to inform the Director of Governance of any gifts and hospitality received from third parties so that they can be recorded on the Gifts and Hospitality Register.
19. If there is any uncertainty whether a gift or hospitality should be accepted or declined, advice from the Director of Governance should be sought.
20. This policy is owned by the Director of Governance.
21. The policy will be reviewed by the Audit Committee and recommended to the Corporation for approval.
22. The policy will be reviewed every three years unless there is a change to legislation requiring update.
23. The policy is available on the Group's intranet, included in periodic staff briefings and relevant training/ CPD activities and induction events.