

# Anti-Bribery and Corruption Policy

Version 1.0 (August 2020)

*Prepared by: Wole Koiki*

*Checked and approved by: Ferdinand Joseph*

*Date: 03/08/2020*

*Next review due: 03/08/2021*

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## **Anti-Bribery and Corruption Policy:**

This policy applies to:-

- Awarding
- Any future business units or subsidiaries
- Our stakeholders, including our customers

## **Scope and Purpose of Policy:**

NCFE has zero tolerance towards bribery and corruption in any form.

Bribery and corruption are criminal acts. Identified risks of bribery/corruption may result in prosecution(s). As such, any person or body employed by, or acting on behalf of NCFE Group ('individual') is required to comply with the contents of this policy and procedure.

This policy applies to all individuals working for or on behalf of NCFE, including colleagues at all locations and at all levels including members of the Executive Team, external contractors, agency workers, partners, suppliers, centres, any associates, any subsidiaries or their employees or any other person associated with us (collectively referred to in this document as 'individuals').

A separate process is outlined for members of the Board in the document 'Code of Conduct for Trustees'. NCFE complies with all relevant laws in all the jurisdictions in which it operates. As such, this policy extends to all of NCFE's dealings and transactions in all countries in which it or its consultants, partners, stakeholders and associates operate.

## **Policy Statement:**

NCFE encourages the promotion of building successful business relationships. We support colleagues and any person or body acting on behalf of NCFE ('individuals') in ensuring these relationships do not in any way conflict with our requirement to engage in business relationships in a legal, transparent, ethical and responsible manner.

This policy provides advice to individuals who, in Page 2 of 14 the course of their day-to-day work or as a result of their employment/contract of services, may be placed in situations which may potentially introduce the risk of, or perception of, bribery and/or corruption.

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The policy also supports our compliance with our legal and regulatory requirements, namely:

- Bribery Act 2010 (see Appendix 2 for further information)
- The Charity Commission Regulations
- Ofqual's General Conditions of Recognition (A4.1) and any other similar Awarding regulatory requirements

NCFE recognises that bribery and corruption, or the perception of these practices, are not only illegal but are also contrary to the fundamental values of integrity, transparency and accountability, and that they undermine organisational effectiveness. NCFE considers the elimination of bribery and corruption from our business and business practices to be essential to our business. The implementation of this policy and procedure forms a significant aspect of our overall risk management and corporate governance assurances.

#### **Location and Access to the Policy:**

The Anti-Bribery and Corruption Policy is located as follows:

Website: Stakeholders, customers, suppliers

#### **Persons Responsible for the Policy:**

Director

#### **Raising concerns; confidentiality and whistleblowing regarding risks of bribery or corruption:**

To assist us in managing significant risks with regards to potential bribery/corruption, individuals must tell us about any relevant issue that has come to their attention. We appreciate that they may wish to do so in confidence, therefore individuals are referred to our Whistleblowing Policy (available on our website) for more information.

#### **Risk management in relation to bribery and corruption:**

Assessing the risks to NCFE of bribery and corruption is an integral part of NCFE's overall and ongoing risk management process. Implementation of NCFE's anti-bribery procedures is monitored as part of NCFE's overall risk management and internal control processes.

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Cases of bribery or corruption will be escalated as appropriate to an Executive Member (usually the Director of PoD) / Board Trustee in line with this procedure.

Reviews of NCFE's anti-bribery and corruption procedures are made periodically.

### **Managers:**

All line managers are responsible for ensuring this document is complied with by colleagues and for monitoring the activities and performance of those they are managing.

Line managers discovering or receiving information on instances of potential bribery or corruption must report the matter to their Senior Leadership Team (SLT) member (usually a Head of Department), unless:

The colleague concerned is, or the matter relates to, a member of the SLT, then the manager must report the matter to a Director or Executive member.

The colleague concerned is, or the matter relates to, an Executive member, the manager/SLT member must report the matter to the Director of PoD , who will report the matter to the Chair of the Audit, Risk and Investment Committee.

### **Anti-bribery and corruption procedures – specific risk areas:**

#### **Gifts, donations and hospitality:**

The giving and receiving of gifts and hospitality is conducive to good customer and stakeholder relationships and NCFE encourages gifts and hospitality be given / received as appropriate in line with customary business practice. The value of and purpose for all gifts and hospitality must be reasonable, open and transparent. Any gifts or hospitality given must be provided openly, and in the company's name.

NCFE recognises that the company serves a charitable Board and in line with our core values, consideration must always be given to our charitable status in the decision to offer gifts and hospitality. As such, the following figures are generally deemed reasonable:

up to £25 per gift for receiving gifts up to £50 per gift for giving gifts up to £50 per person for giving or receiving hospitality.

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There may be rare occasions where it is reasonable to exceed these figures. However, in protection of both individuals and the business against claims of perceptual or alleged bribery or corruption, we must be open and transparent. Therefore, the giving of gifts or hospitality over the value of £50 per person must receive prior authorisation from an Executive member.

### **Gifts:**

No NCFE Trustee, Executive member, employee, consultant or contractor will accept, directly or indirectly, any discount, gift, or favours (referred to as gifts) or give any discount, gift, or favour, etc. that may influence or be perceived to influence the exercise of their employment function, the performance of their employment duties or their professional judgement.

### **Receiving gifts:**

All cash gifts will be refused. Gifts with a value of less than £25 may be retained by the recipient. All gifts with a value of more than £25 may be accepted but must be given to the Business Support Team (BST) who will include the gift in a raffle for charity.

### **Giving gifts:**

The giving of cash as a gift is not permitted. Cash-equivalent gifts (including gift certificates and vouchers) are generally not appropriate as gifts for centres; however they can on occasion be given as gifts for learners. Please check with your line manager if you are unsure prior to giving a gift. Please note the £50 limit on gift giving.

### **How to contact us:**

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