



**BRIBERY PREVENTION, GIFTS AND
HOSPITALITY - POLICY &
PROCEDURES**

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Introduction

This policy defines standards and guidelines in relation to adherence to the anti-bribery measures and standards that should apply to the acceptance and provision of gifts and hospitality. In particular, the policy is designed to comply with The Bribery Act 2010 (see Guidance notes).

The policy is set out under the following headings:

- anti-bribery policy;
- dealing with contractors, agents and business partners;
- giving gifts and hospitality;
- receiving gifts and hospitality;
- compliance;
- conflicts of interest policy;
- reporting bribery, corruption and suspected non-compliance with this policy.

Anti-bribery policy

Bluestone College values its reputation for ethical behaviour and financial probity and reliability. Bluestone College recognises that any involvement in bribery is illegal and will reflect adversely on its image and reputation.

Bluestone College prohibits the offering, giving, soliciting or the acceptance of any bribe in whatever form to or from any person or company, public or private by any company member, member of staff, contractor, consultant, agent, overseas agent, external examiner and any non-employee service provider engaged on Bluestone business for whatever reason.

The prevention, detection and reporting of bribery is the responsibility of all staff.

Dealing with contractors, agents and business partners

The Bribery Act 2010 highlights two specific types of bribery that could lead to prosecution of Bluestone College:

the liability to prosecution if a person associated with it bribes another person....., where an associated person is one who performs services on or behalf of the organisation; and bribery of a foreign public official, where an official is one who holds a legislative, administrative or judicial position in a territory or country outside the UK.

This means that Bluestone College needs to take care to ensure that any contractors, agents or business partners acting on its behalf comply with the Act. 2

It is therefore essential that contractors and agents acting on Bluestone behalf are made aware of Bluestone Colleges anti-bribery policy, through Bluestone College terms and conditions or through the tendering process for larger contracts. In the case of international agents, reasonable due diligence must be carried out to ensure that they are not acting in a way that would compromise Bluestone.

Giving gifts and hospitality

Staff may not, directly or through others, offer or give any, money, gift, hospitality or other thing of value to an official, employee or representative of any supplier, customer or any other organisation, if doing so could reasonably give the appearance of influencing the organisation's relationship with Bluestone College.

Staff may:

- give gifts of a nominal value;
- with management approval, provide meals and other entertainment at venues outside Bluestone, provided that the expenses are kept at a reasonable level. For the avoidance of doubt, the per capita cost of a meal should not exceed £50 and would normally be much less;

Receiving gifts and hospitality

An employee or any member of their family should not, directly or through others, solicit or accept money, gifts, hospitality or anything else that could influence or reasonably give the appearance of influencing the relationship with that organisation or individual.

Gifts or hospitality may not be accepted, irrespective of value, which might influence or be seen to influence such situations as the outcome of an exam, the acceptance of a student into Bluestone, the award of business (contract) or the use of Bluestone Intellectual Property or other assets, or to benefit personally or for the benefit of any person connected to that person.

Unless you have been informed otherwise you may accept:

A gift of nominal value, such as an advertising novelty, when it is customarily offered to others having a similar relationship with that individual or organisation;

Customary meals or entertainment provided that the expenses are kept at a reasonable level.

For the avoidance of doubt:

Gifts with a value of more than £25 and hospitality expected to cost in excess of £50 should be authorised by your line manager;

Gifts or hospitality in excess of £100 should be authorised by a member of the management

Hospitality or gifts in excess of £500 should be authorised by the Organisational Head

If you have received an excessive gift or hospitality then your manager will discuss the circumstances with you and agree how to deal with it e.g. a gift can be returned or steps can be taken to ensure that the acceptance of hospitality does not influence a decision or situation in favour of the giver. If excessive gift(s) or hospitality are accepted on more than one occasion or are found to have influenced decisions inappropriately, against Bluestone policy (or potentially illegally), then appropriate disciplinary procedures will followed.

Compliance

All staff are required to comply with The Bribery Act 2010. The Managing Director is responsible for Bluestone Colleges policy in relation to The Bribery Act 2010. Contact the MD if further guidance is required.

Conflicts of interest policy

A conflict of interest occurs when you advance a personal interest (or that of others with whom you are connected) at the expense of Bluestone College.

Reporting bribery, corruption and non-compliance with this policy

If you know of, or have good reason to suspect that, an unlawful or unethical situation or that you suspect that either an act of bribery or non-compliance to this policy has occurred; you should report the matter to your line manager. Should reporting in this way be inappropriate, you should refer to Bluestone's whistle blowing procedure