

THE STAFF COLLEGE and VSC PLUS LTD
ANTI-BRIBERY POLICY

1. Introduction

The Staff College and its trading arm VSC Plus Ltd (referred to throughout this document as 'the College') is committed to implementing and enforcing effective systems to counter bribery. Therefore, it is the College's policy to conduct all aspects of its business in an honest and ethical manner at all times.

This policy applies to all individuals working for the College, including anyone providing services such as consultants, or contractors.

The aim of this policy is to help the College act in accordance with the Bribery Act 2010, maintain the highest possible standards of business practice and advise individuals of the College's 'zero-tolerance' of bribery.

2. The law

Under UK law (UK Bribery Act 2010), bribery and corruption is punishable for individuals by up to ten years' imprisonment. If the College is found to have taken part in the corruption or lacks adequate procedures to prevent bribery, it could face an unlimited fine and be excluded from tendering for Government contracts.

3. Policy statement

No individual will:

- make contributions of any kind with the purpose of gaining any commercial advantage
- provide gifts or hospitality with the intention of persuading anyone to act improperly, or to influence a public official in the performance of their duties
- make, or accept, "kickbacks" of any kind.

The College will:

- keep appropriate internal records that will evidence the business reason for making any payments to third parties
- encourage employees to raise concerns about any issue or suspicion of malpractice at the earliest possible stage
- see that anyone raising a concern about bribery will not suffer any detriment as a result, even if they turn out to be mistaken.

4. Receipt of gifts

Staff responsible for the purchase of supplies or equipment; for making decisions on any tenders; or who are involved with contractors working for the College, should take particular care when offered any form of gift or hospitality from people or organisations involved.

Receiving promotional gifts of low value is normal and appropriate, however, gifts with a value exceeding £25.00 may not be accepted without approval. Any gift offered and then refused because of its value, must be reported to the College.

Gifts with an assessed value of more than £25 should not normally be accepted. Where such a gift cannot be refused without causing embarrassment, then it may, exceptionally and subject to the approval of a Director, be accepted. Gifts with a value of less than £25 should only be accepted when they are occasional and where acceptance would not give rise to public concern. Gifts of money should always be refused.

5. Gifts and hospitality register

In order to protect staff against allegations of impropriety, a Gifts and Hospitality Register has been set up for staff to declare any gifts or hospitality they have accepted. This is kept by the PA to the Chief Executive. All gifts or hospitality valued at £25 or more must be recorded in this register without delay. The register should record the name of the recipient, a description of the gift or hospitality, the approximate value, the date received and the name of the provider. It is the individual's responsibility to ensure completion of this register.

6. Receiving hospitality

The acceptance of corporate hospitality must be transparent; all invitations must be reported to the College before an employee accepts any invitation. The following areas are exempt while attending conferences, seminars, sponsored by third parties:

- business and travel expenses incurred
- normal business lunches and meals

7. Non compliance

7.1 Staff

If an individual bribes (or attempts to bribe) another person, intending either to obtain or retain business for the SC, or to obtain or retain an advantage in the conduct of the College's business this will be considered gross misconduct. Similarly accepting or allowing another person to accept a bribe will be considered gross misconduct. In these circumstances you will be subject to formal investigation under the College's disciplinary procedures, and disciplinary action up to and including dismissal may be applied.

7.2 Visitors

In the event of a breach of the policy by other organisations, or individuals, the College will take appropriate action.

8. Monitoring, amendments and review

The policy will be monitored on an on-going basis to ensure that it addresses issues effectively.

The following will be monitored:

- that all individuals working for the College are advised of the policy
- assessment of any reported incident or related occurrence.

Monitoring of the policy is essential to assess how effective the SC has been to establish control of its obligations.

Should any amendments, revisions, or updates be made to this policy the College will provide notice to all individuals. This policy will be reviewed and, if necessary, revised in the light of legislative or organisational changes.

Appendix 1

Definitions

Bribe is a financial or other advantage offered or given to anyone to persuade them to or reward them for performing their duties improperly, or, with the intention of influencing them in the performance of their duties.

Hospitality is the practice of being hospitable, this includes the reception and entertainment of guests / visitors.

Kickbacks or facilitation payments are typically small payments made in return for a business favour or advantage.