

**RNC Policy & Procedure: Anti Bribery and Corruption**

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| Responsibility: | Human Resources |
| Reviewed by: | HR Manager |
| Approved by SMT: | February 2024 |
| Approved by Governor or Committee: | N/A |
| Date of next review: | February 2025 |
| EIA Completed: | March 2021 |
| Published on website: | Yes |
| Uploaded on to Smartlog: | Induction only |
| Available to: | RNC Staff |
| Other relevant policies and reference documents - held in the Policy Library:  RNC Policy Library   * Staff disciplinary * Gifts and Hospitality * Whistleblowing | |
| **Commitment Statement**  RNC is committed to the fundamental values of equality, diversity and inclusion, which creates a supportive environment for all members of our community to live, work and study. Our commitment to equality and diversity means that this policy has been screened in relation to the use of plain English, the promotion of the positive duty in relation to race, gender and disability and to eliminate discrimination to other equality groups related to age, sexual orientation, gender identity, marital or civil partnership status, pregnancy or maternity and religion or belief. We believe that safeguarding has paramount importance and RNC recognises its responsibility and duties within the Government Prevent Strategy to be aware of and where appropriate act to ensure the safety of all students from radicalisation and extremism.  This document is available in alternative formats on request. If you think RNC can improve the fairness of this policy please contact the author who has responsibility for the review and update. | |

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# Policy Statement

The Board of Governors, as RNC Charitable Trustees, expects all RNC personnel to demonstrate honesty and integrity at all times, and to exercise high standards of professionalism and ethical conduct in all their activities. RNC also expects its partners, advisors, clients, customers, suppliers, contractors, consultants and all stakeholders along with their employees to adopt the same standards. In the event that an organisation or individual is unclear as to whether this policy applies they should operate on the basis that it does apply.

RNC has a zero-tolerance approach to bribery or any other form of corrupt or dishonest behaviour.

RNC staff should never seek, accept or give a bribe, facilitation payment, kickback or other improper payment.

# Definitions

**Bribery:** Bribery is the act of offering, giving, promising, asking, agreeing, receiving, accepting, or soliciting something of value or of an advantage so as to induce or influence an action or decision. In the College context, an outcome also includes any academic outcome.

**Corruption:** Dishonest or fraudulent conduct by those in power, typically involving bribery.

**Facilitation payment:** A form of bribery that involves expediting or facilitating the performance of a public official for a routine governmental action.

**Kickbacks:** Payments, typically made in exchange for a favour or advantage.

# Our Policy

RNC will take appropriate steps to ensure that:

3.1 We do not offer, promise, give, accept or demand a bribe or other undue advantage (including excessive gifts and hospitality) in order to obtain or retain business, or gain any other improper advantage.

3.2 We do not offer, nor give in to demands, to make illicit or illegal payments to agents, public officials (at whatever level), or anybody else with whom we do business, including third parties.

3.3 We engage and remunerate agents and other third parties only for legitimate services, consistent with the terms of their contract. We will use our best endeavours to ensure that we do not allow others to offer, promise, give, accept or demand a bribe on our behalf.

3.4 We promote staff awareness of, and compliance with, College policies against bribery during induction, through briefings, and appropriate dissemination of our own procedures (including disciplinary procedures) and policies. Particular attention is paid to ensuring that, as part of their induction, all staff are aware of the College’s stance on bribery and all other forms of dishonest behaviour.

3.5 We adopt management control systems that discourage bribery, and adopt sound financial and tax accounting and auditing practices that seek to prevent it.

3.6 We raise awareness of the need to combat bribery with our partners and stakeholders by publication of this policy and (where appropriate) through rigorous systems of contract management.

# Guidance to staff

If you have any concerns that an action, or suggested action, may constitute bribery, contact your line manager or a member of the Senior Management Team (SMT). If you believe you are being put under duress to accept or condone a bribe, you should seek advice and support immediately, either from your line manager or a member of SMT.

If you are still uncomfortable or are concerned by the actions of others, you can make use of the confidential Whistleblowing provision, as outlined in the separate Whistleblowing Policy.

# Appropriate Steps

The steps which RNC will take to comply with this policy will include:

* Review and revision, as appropriate, of policies and procedures, particularly in the areas of Human Resources and Finance
* Review and revision, as appropriate, of procedures for establishing and managing contracts
* Training and awareness-raising for Governors and staff

## Version Control History

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| --- | --- | --- | --- |
| Version | Date | Amendments | Author |
| 1.0 | 06.08.18 | Reviewed, format changed  Listed Amendments:  Throughout any reference to ‘the College’ has been replaced with ‘RNC’.  Equality and Diversity Statement amended to Commitment Statement.  Removed reference to other policies.  Added policy statement to include volunteers.  Added Point 2: Definitions. Moved the definition of bribery to this section.  Clarified Pont 4: Guidance to Staff to seek advice from a member of SMT.  SMT approved | HR |
| V1.1 | 13.09.19 | Reviewed, no amendments required.  Formatting  Approved by SMT November 2019 | HR  EG |
| V1.2 | 15.12.20 | Reviewed – no changes made | LB |
|  | 02.12.21 | Reviewed – no changes made | LB |
|  | January 2023 | Reviewed – no changes made | LB |
| V1.3 | February 2024 | Format updated.  Version control moved to the end of document.  EIA moved to EIA folder. | LB |