



Glasgow Kelvin College

Equality Impact Assessment
Anti-Bribery Policy/ Statement
Version 5.
(Abridged)

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Title of Policy, Procedure or Practice:

Anti-Bribery Policy/ Statement

Type of Policy, Procedure or Practice:

New

Existing, Reviewed or Revised

x

Team Leading Impact Assessment:

Corporate Governance

Lead Person:

Lisa Clark

Date of Assessment: 29/11/19

Aims and Outcomes

What are the intended aims / outcomes of the policy, procedure or practice? Who is the target audience and who is it intended to benefit?

It is the existing policy of the Board of Management:

ÿ To endorse the Nine Key Principles of Public Life in Scotland

ÿ To investigate fully any substantive allegation of a breach of relevant legislation.

ÿ To ensure that allegations of unethical or illegal behaviour are dealt with expeditiously, consistently, fairly and within the requirements of The Public Interest Disclosure Act 1998.

ÿ To ensure that all procurement is conducted prudently and honestly.

ÿ To require the College to operate a system of financial record keeping and budgetary control capable of meeting both the College's own internal accounting needs and the need to demonstrate accountability for the use of public funds.

ÿ To ensure that the risk of fraud and corruption is minimised.

ÿ To ensure that employees of the College:

- are aware they are not entitled to retain any fees, commission etc received in connection with the duties of an appointment;

- declare an interest (if a budget holder) on an annual basis if there is any personal, family, financial or other connection [directly or indirectly] which may be thought to compromise the College;

- comply with the Public Interest Disclosure Policy/Whistle Blowing Policy if they have reason to suspect unethical or illegal behaviour by another person in the College (including the Board of Management);

- comply with the Gifts and Hospitality Policy.

The Bribery Act 2010, imposes further obligations on the College. These obligations include the establishment of procedures which can be put into place to prevent bribery by persons associated with the College and the publication by the Board of its commitment to the Act.

In compliance with those obligations, it is the policy of the Board of Management in relation to the Act:

• To ensure that its members comply with the obligations imposed upon them by the Act and other relevant legislation.

• To retain responsibility for any decision making in relation to critical bribery issues.

• To foster a culture of integrity where bribery is unacceptable.

• To communicate this policy to the College's employees, contractors, agents, students, partners, stakeholders, other persons associated with it and the general public.

• To commit the College to carry out its work and business fairly, honestly and openly.

• To publicly state its commitment to zero tolerance towards bribery.

• To confirm the reputational, student and business benefits accruing from the rejection of bribery.

• To encourage transparent dialogue throughout the College so as to seek to ensure effective dissemination of anti-bribery policies and procedures to employees, students and all others who come into contact, or work, with the College.

• To ensure that the College provides effective training to its employees, which is continuous, and regularly monitored and evaluated, through education and awareness raising about the threats posed by bribery so as to firmly establish an anti-bribery culture.

• To ensure that those participating in training develop a firm understanding of what the College's policies and procedures mean in practice for them.

• To follow the best practice objective of avoiding doing business with others who do not commit to doing business without bribery.

• To remind all employees, contractors, agents, students and other persons associated with the College of the existing Public Interest - Whistle Blowing Policy.

• To remind all employees, contractors and suppliers that they are required to comply fully with all relevant legislation.

• To instruct the Principal and Chief Executive to establish appropriate procedures including the design, operation and monitoring of bribery prevention procedures and their regular review which demonstrate the College's commitment to compliance with the Act.

• To instruct the Principal and Chief Executive to report regularly to the Board on the College's anti-bribery measures.

Y To communicate to employees and students that breaching the anti- bribery policies and procedures and therefore the requirements of the Act will lead to appropriate disciplinary action in the interests of the College.

Y To endorse all bribery prevention related publications which are relevant to the operation of the College.

Y To join with other Colleges and Colleges Scotland in appropriate collective action against bribery.

Y To keep under regular review the Board’s Policy on the Bribery Act 2010 and the College’s bribery prevention procedures.

4. Responsibility

The Board of Management is responsible for the maintenance of this policy and related procedures through the Audit and Risk Committee.

Evidence and Information

What information has been used as the basis for this EIA?

A review of this policy shows that it applies to all individuals without prejudice and would therefore have no negative impacts on those individuals with protected characteristics.

What does the information indicate about potential positive, neutral or negative impacts for each protected characteristic?

Protected Characteristics	Potential Impact
Age	None

Disability	None
Gender Reassignment	None
Marriage and Civil Partnership	None
Pregnancy and Maternity	None
Race	None
Religion or Belief	None
Sex	None
Sexual Orientation	None

Are you able to reduce any potential negative impacts identified? If so, how?

Compliance with General Equality Duty

Does the policy, procedure or practice comply with the three parts of the general duty?

- **Eliminate discrimination, harassment and victimisation and other conduct prohibited by the [Equality Act \(2010\)](#)**
- **Foster good relations between people from different groups - this involves tackling prejudice and promoting understanding between people from different groups**
- **Advance equality of opportunity between people from different groups**

Yes No

If no, what arrangements could be implemented to better comply with the duty?

What is the EIA outcome?

A positive impact is likely A negative impact is not foreseen

A negative impact is likely A negative impact is probable or certain

Are you able to introduce the policy, procedure or practice without changes? Yes No

If no, what changes will you make before implementation?

Action and Monitoring

What action will be taken, by whom and when?

Once implemented how the policy will, procedure or practice be monitored?

All policies are reviewed by the policy lead and the EDI committee and updated if required to reflect legal or organisational changes but otherwise three yearly.

NB: Finalisation of central monitoring & identification of compound impact will be undertaken within Equalities Management. Please return to the EDI manager for approval by the EDI Committee

Approval –

Signed –Patricia Currie, EDI Manager

Date – 29/11/19

Signed – Stephen Smith Acting Director of Curriculum and Quality

Date – 29/11/19

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Appendix

Equality Act General Duty requires colleges to have **due regard** to the need to:

1. Eliminate

- a) discrimination,
- b) harassment,
- c) victimization; or
- d) any other prohibited conduct

2. Advance equality of opportunity by

- a) removing or minimising disadvantage
- b) meeting the needs of particular groups that are different from the needs of others
- c) encouraging participation in public life

3. Foster good relations – tackle prejudice, promote understanding

Protected Characteristics:

- 1. Age
- 2. Disability
- 3. Gender Reassignment
- 4. Marriage And Civil Partnership (applies only in relation to (1a) discrimination in *employment*, not to students)
- 5. Pregnancy And Maternity
- 6. Race
- 7. Religion Or Belief
- 8. Sex/ Gender
- 9. Sexual Orientation.