

# Anti-Bribery and Corruption Policy

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<b>Related external policies and regulations</b>	Bribery Act 2010		

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## Introduction

The Bribery Act 2010 strengthened UK legislation on bribery<sup>1</sup>. The Act came into force on 1 July 2011 and applies to all UK businesses and charities and covers business carried out in or outside the UK<sup>2</sup>. The Bribery Act 2010 not only makes bribery illegal, but also holds organisations, liable for failing to prevent such acts by those working for or on its behalf, no matter where the act takes place.

It is the policy of RTC Education Ltd. to conduct all of its business in an honest and ethical manner. We do not tolerate bribery and corruption in any form and our conduct of all our business dealings must be exemplary at all times. This policy applies to all business dealings and transactions by and in connection with RTC Education Ltd. in all countries

## Purpose of this policy

To set out the responsibilities of “staff” in observing and upholding RTC Education Ltd.’s position on bribery and corruption; and provide information and guidance to those working for us on how to recognise and deal with bribery and corruption issues.

## Scope

This policy applies to all individuals working for RTC Education Ltd. at all levels (whether permanent, fixed-term or temporary), and includes Directors, Academic and Teaching Staff, Non-Academic Staff, employees, agents or any other person associated with RTC Education Ltd. (collectively referred to as ‘staff’ in this policy).

This policy also applies to business and activities carried out in the name of RTC Education Ltd.

It is the policy of RTC Education Ltd. that all “staff” conduct business in an honest way, and without the use of corrupt practices or acts of bribery to obtain an unfair advantage. This is not just a cultural commitment on the part of the company; bribery is a criminal offence in most countries and corrupt acts expose the company and its employees to the risk of prosecution, fines and imprisonment, as well as endangering the company’s reputation. Any breach of this policy will be regarded as a serious matter and is likely to result in disciplinary action

## Definition of Bribery and Corruption

Acts of bribery or corruption are designed to influence the individual in the performance of their duty and incline them to act dishonestly. The person being bribed is generally someone who will be able to obtain, retain or direct business. This may involve initiatives such as buying or selling, or it may involve the handling of administrative tasks such as licences, customs, visas or taxes. It does not matter whether the act of bribery is committed before or after the activity has been undertaken.

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<sup>1</sup> [The Bribery Act 2010 - Guidance \(publishing.service.gov.uk\)](https://www.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/442222/the-bribery-act-2010-guidance.pdf)

<sup>2</sup> [Anti-bribery policy - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/442222/anti-bribery-policy.pdf)

A bribe is an inducement, favour or reward offered, promised or provided in order to gain any business or personal advantage.

Bribes can take many forms, but typically they involve corrupt intent. There will usually be a 'quid pro quo' – both parties will benefit. A bribe could be:

The direct or indirect promise, offering or authorisation of anything of value

The offer or receipt of any kickback, loan, fee, reward, gift or other advantage

The giving of aid, donations or voting designed to exert improper influence.

Corruption is the misuse of public office or power for private gain, or misuse of private power in relation to business outside the realm of government.

### **Staff responsibilities**

RTC Education Ltd. will keep a register of staff who, either as part of their induction process or otherwise, have been given training on this anti-corruption and bribery policy. All those that have received training must sign in the register to certify that they have read and understood the policy and will comply with it.

The prevention, detection and reporting of bribery and other forms of corruption are the responsibility of all those working for RTC Education Ltd. or under its control. All staff are required to avoid any activity that might lead to, or suggest, a breach of this policy.

Staff must notify the CEO as soon as possible if he/she believes or suspects that a breach of this policy has occurred or may occur in the future.

Any employee who breaches this policy will face disciplinary action, which could result in dismissal for gross misconduct. We reserve our right to terminate our contractual relationship with other workers if they breach this policy.

Staff can take the following steps to assist in the prevention of bribery and corruption:

#### **A. Risk Assessment**

Effective risk assessment lies at the very core of the success of this policy. All staff must assess the vulnerability of their activities, on an ongoing basis and discuss potential vulnerabilities with the CEO. Risk identification pinpoints the specific areas in which we face bribery and corruption risks and allows us to better evaluate and mitigate these risks and thereby protect ourselves.

#### **B. Accurate Books and Record-Keeping**

Many serious bribery and corruption offences have been found to involve some degree of inaccurate record-keeping. Accurate records and financial reporting must be maintained for all activities and for all third-party representatives acting on our behalf.

False, misleading or inaccurate records of any kind could potentially damage the reputation of the company.

### C. Effective monitoring and Internal Control

Effective systems of monitoring and control are essential. Once bribery and corruption risks have been identified and highlighted through the risk assessment process, we may need to amend procedures to help mitigate these risks on an on-going basis.

## **Risks**

The following paragraphs summarise some key activities where potential risks arise

### A Use of third-party representatives

The definition of a third-party representative is broad, and could include agents, distributors, consultants and joint venture partners. Third-parties who act on the company's behalf must operate at all times in accordance with this policy. Staff are responsible for the evaluation of each third-party relationship and determining whether or not there are specific risks. Where specific risks are identified, the third party should be made aware of this policy, and staff should ensure that appropriate enhanced controls are implemented to monitor and control the risk. RTC Education Ltd. is responsible for ensuring that third-parties who pose significant risks are compliant with this policy as well as any local laws.

### B Gifts, Entertainment and Hospitality

Gifts, entertainment and hospitality include the receipt or offer of gifts, meals or tokens of appreciation or gratitude, or invitations to events, functions, or other social gatherings, in matters connected with our business. These activities are acceptable provided they fall within reasonable bounds of value and occurrence.

1. Gifts specifically exclude cash and monetary gifts. Under no circumstances should staff accept cash or monetary gifts if they are offered.
2. Genuine and appropriate hospitality and reasonable promotional activities are not considered acts of bribery in themselves but must nevertheless be conducted in accordance with defined principles. The following criteria are designed to test if gifts, hospitality, favours or reimbursed expenses comply with this policy. If in doubt, you should consult the CEO.
  - a. Made for the right reason. If it is a gift or hospitality, it should be given clearly as an act of appreciation. If travel expenses, it should be for a bona fide RTC Education Ltd. purpose.
  - b. No obligation. The gift, hospitality, favour or reimbursement of expenses must not place the recipient under any obligation.
  - c. No expectations. Expectations should not be created in the giver or an associate of the giver, nor should the giver attach a higher importance to such a transaction than the recipient would place on it.
  - d. Made openly. Any transaction should be transparent. If it is made secretly and is not documented, the purpose will be open to question.

- e. Accords with stakeholder perception. The transaction should not be viewed unfavourably by stakeholders or other interested parties if it were made known to them.
  - f. Reasonable value. The size of the gift should be small and the value of the hospitality or reimbursed expenses accord with general school and business practice.
  - g. Appropriate. The nature of the gift, hospitality or reimbursed expense should be appropriate to the relationship and in line with the code of conduct outlined in the Employee Handbook.
  - h. Legality. It must comply with relevant UK and local laws.
  - i. Conforms to the recipient's rules. The gift, hospitality or reimbursement of expenses should meet the rules or code of conduct of RTC Education Ltd.
  - j. Infrequent. The giving or receiving of gifts and/or hospitality must not be a regular occurrence between the giver and the recipient.
3. RTC Education Ltd. appreciates that the practice of giving business gifts varies between countries and regions and what may be normal and acceptable in one region may not be in another. The test to be applied is whether in all the circumstances the gift or hospitality is reasonable and justifiable. The intention behind the gift should always be considered.

## **Raising Concerns**

Staff are encouraged to raise concerns about any issue or suspicion of malpractice at the earliest possible stage. RTC Education Ltd. is absolutely committed to ensuring that all staff have a safe, reliable and confidential way of reporting suspicious activity. If you are concerned that a corrupt act is being considered or carried out, you should report the matter to your line manager in the first instance. If it is not possible to speak to your line manager for some reason, you should contact the CEO. More details of how to go about reporting your concerns can be found in the Whistleblowing Policy.

Individuals discovering apparent evidence of malpractice, impropriety or wrongdoing within the company should feel able to disclose the information appropriately without fear of reprisal. A disclosure made in good faith which is not confirmed by subsequent investigation will not lead to any action against the person making the disclosure. Individuals making disclosures which are found by subsequent investigation to be malicious and/or vexatious may be subject to disciplinary or other appropriate action.