

## Anti-bribery policy

### Definition

Bribery is the accepting of gifts, money, hospitality or other favours in return for providing something of value to the briber. The purpose of this policy is to set out the rules that must be followed within East Essex Vocational Training to ensure that no bribery occurs and in accordance with the Bribery Act 2010.

### Unacceptable behaviour

The following behaviour is unacceptable, and must not occur in East Essex Vocational Training:

- **accepting** any financial or other reward from any person in return for providing some favour
- **requesting** a financial or other reward from any person in return for providing some favour
- **offering** any financial or other reward from any person in return for providing some favour.

### Business gifts

From time to time, customers, suppliers or other persons might offer a gift to an employee. This could be a small item, or something of considerable value. All gifts, however small, must be reported to the Chief Executive and recorded. No gifts with a value of more than £20 may be accepted. If a gift is offered and then refused because of its value, this must be reported to the Chief Executive.

### Receiving hospitality

From time to time, customers, suppliers or other persons might invite an employee to a hospitality event. All such invitations must be reported to the employee's line manager, who may decide to consult the Operations Director, or the Chief Executive. Permission must be given by the line manager before an employee accepts any invitation.

### Hospitality events

East Essex Vocational Training occasionally holds hospitality events, primarily aimed at thanking supporters, stakeholders and suppliers for their help and loyalty. An employee must not organise any additional hospitality event without seeking authority from his or her line manager.

### Responsibilities of the Deputy Chief Executive

The Chief Executive is responsible for keeping a record of all gifts and hospitality that are received by employees working in First Rung.

If the Operations director is concerned about any actions, they will contact the Chief Executive immediately for advice.

The Chief Executive is also responsible for ensuring that all employees are aware of this policy, and fully understand the rules in relation to the acceptance of gifts and hospitality.

### **Expenses**

Line managers must authorise all expense claims from their employees and are expected to check and sign all expense claims from their employees against receipts.

Any items of expenditure that give rise to concern should be fully investigated in the first instance by the line manager.

### **Attempts to bribe**

Any employee who is concerned that he or she is potentially being bribed should report this matter to his or her line manager immediately.

### **Donations to organisations**

No employee should make donations to a charity without approval of their manager and no donations should be made to charities, political parties or other organisations with the intention of gaining a business advantage.

### **Disciplinary action**

Any employee found to have offered or accepted a bribe will face disciplinary action which could include dismissal for gross misconduct.

### **Raising concerns**

If an employee is concerned that acts of bribery are occurring in East Essex Vocational Training, they should inform their line manager in the first instance. If this course of action is inappropriate, the employee should inform the Operations Director

All company policies are reviewed annually.

Reviewed April 2018

