



# MEPA TRAINING

## ANTI-BRIBERY POLICY

THIS POLICY IS WRITTEN FOR AND APPLIED TO MEPA STUDIOS, MEPA ACADEMY AND MEPA COLLEGE.

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## **ANTI BRIBERY STATEMENT**

It is our Policy to conduct all of our business in an honest and ethical manner. We take a zero-tolerance approach to bribery and corruption and are committed to acting professionally, fairly and with integrity in all our dealings wherever we operate and where necessary. We are also committed to implementing and enforcing effective systems to counter bribery.

## **BRIBERY ACT 2010**

The School is committed to complying with the Bribery Act 2010 in its business activities in the UK and overseas. Under the Bribery Act 2010, a bribe is a financial or other type of advantage that is offered or requested with the:

- intention of inducing or rewarding improper performance of a function or activity; or knowledge or belief that accepting such a reward would constitute the improper performance of such a function or activity.

A relevant function or activity includes public, state or business activities or any activity performed in the course of a person's employment, or on behalf of another School or individual, where the person performing that activity is expected to perform it in good faith, impartially, or in accordance with a position of trust. A criminal offence will be committed under the Bribery Act 2010 if:

- an employee or associated person acting for, or on behalf of, the School offers, promises, gives, requests, receives or agrees to receive bribes; or
- an employee or associated person acting for, or on behalf of, the School offers, promises or gives a bribe to a foreign public official with the intention of influencing that official in the performance of his/her duties (where local law does not permit or require such influence); and
- the School does not have the defence that it has adequate procedures in place to prevent bribery by its employees or associated persons.

All employees and associated persons are required to comply with this policy, in accordance with the Bribery Act 2010.

## **WHO IS COVERED BY THE POLICY?**

This Policy applies to all individuals working or studying at the college at all levels and grades, including Senior Managers, Directors, employees and students (whether permanent, fixed-term or temporary), consultants, contractors, and any other person providing services to us.

## **WHAT IS A BRIBE?**

A 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;
- to any public official with the intention of influencing the officials in the performance of his duties.

## **GIFTS AND HOSPITALITY**

This Policy does not prohibit giving and the receiving of promotional gifts of low value and normal and appropriate hospitality. However, in certain circumstances gifts and hospitality may amount to bribery and all employees must comply strictly with The MEPA ethics policy in respect of gifts and hospitality. We will not provide gifts or hospitality with the intention of persuading anyone to act improperly or to influence staff or students in the performance of his/her duties.

## **RAISING CONCERNS**

Staff will be encouraged to raise concerns about any issue or suspicion of malpractice at the earliest possible stage. No employee will suffer any detriment as a result of raising genuine concerns about bribery, even if they turn out to be mistaken.

## **MONITORING**

The effectiveness of this Policy will be regularly reviewed.