Anti-Bribery and Corruption Policy

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Anti-Bribery and Corruption Policy

1. Introduction

The City of Glasgow College recognises the importance and legal requirement to manage potential bribery and corruption. The principal applicable law regarding bribery and corruption is UK criminal law and in particular the Bribery Act 2010, which has extra-territorial reach and is applicable to the College's activities irrespective of geographic location.

2. Purpose and Aims

The City of Glasgow College values its reputation for ethical behaviour and for financial probity and reliability. The College recognises that any involvement in bribery will reflect adversely on its image and reputation. The College will, therefore, prohibit the offering, the giving, the solicitation or the acceptance of any bribe, whether cash or other inducement to or from any person, company or other organisation. The College shall prevent bribery and corruption by:

- Taking a zero tolerance approach towards bribery and/or corruption.
- Communicating this policy to all employees and agents working on behalf of the College.
- Training employees so that they can recognise and avoid the use of bribery.
- Encouraging its employees to be vigilant and to report any suspicion of bribery.
- Rigorously investigating instances of alleged bribery.
- Taking firm and vigorous action against any individual(s) involved in bribery.

3. Scope

This Policy applies to:

3.1. All members of staff and members of the College Board of Management;

3.2. All geographical locations and all College functions/services;

3.3. All legal entities within the City of Glasgow College group; and

3.4. All third parties, including subsidiaries, agency workers, consultants, suppliers, contractors and overseas agents.

4. Policy Statement

4.1. Bribery & Corruption

4.1.1. Bribery occurs when “Anything of Value” (defined in 5.1) is received or offered to be paid to an employee as an inducement or reward for the improper performance of a duty or obligation. This form of bribery also occurs when a party offers gifts, entertainment or hospitality that will breach the College’s gifts and entertainment regulations. "Passive Bribery" occurs when “Anything of Value” is requested by an employee for the improper performance of their duties or responsibilities.

4.1.2. Corruption is the misuse of entrusted power or public office for private gain and is a serious criminal offence. The principle applicable law regarding bribery and corruption is the criminal law in the UK and particularly the Bribery Act 2010.

4.2. Third Parties

4.2.1. This Policy also applies to the engagement of Third Party intermediaries. The College expects all Third Parties, including business partners, service providers, suppliers and contractors, to act with integrity and to undertake their business without bribery or corruption. In addition to the above, the College will investigate reported allegations of bribery, corruption and abuse of position for personal gain, involving, or in any way connected to the College. If necessary, action will be taken as a result of such investigations, including termination of relationships with Third Parties and reports to relevant governmental authorities or regulators.

4.2.2. The definition of third parties is broad, and could include agents, business partners, service providers, suppliers, contractors or any individual who is nominated to act on behalf of the organisation. Whilst the use of agents and business partners can help us reach our goals, we

need to be aware that these arrangements can potentially present the College with significant risks.

4.2.3. Risks can be identified where a business partner conducts activities on behalf of the College, so that the result of their actions can be seen as benefiting the College. Business partners who act on behalf of the College must be advised of the existence of and operate at all times in accordance with this policy. Local Management is responsible for the evaluation of each relationship and determining whether or not it falls into this category. Furthermore, a risk assessment exercise should be carried out to determine whether the third party intermediary is a high, medium or low risk to the College. Due diligence checks must be carried out when appointing and retaining third parties and such checks include but are not limited to:

- An assessment of the rationale for engaging the third party intermediary;
- An evaluation of the third party's ability to deliver the service;
- An evaluation of the integrity of the third party, including background checks on publicly available records on individuals/companies;
- Financial and credit checks; and
- Standard terms and conditions which specify the scope of the work and inform the third party of the College's Anti-Bribery & Corruption policy and includes the right to audit, right to exit in the event of a suspicion and/or breach occurring.
- A review of the global Corruption Perceptions Index (Appendix 1) and an assessment for all countries will be conducted prior to any engagement.

4.3. Facilitation Payments

4.3.1. The College will not tolerate or condone the use of facilitation payments by its employees or any person acting on behalf of the College. This requirement covers any Public Official from any country worldwide.

4.4. Political Donations

4.4.1. The College will not make any political donations to candidates for public office, individual politicians, political parties and other political organisations. Members of staff are, therefore, not authorised to make any political donations on behalf of the College.

4.5. Charitable Gifts & Sponsorship

4.5.1. The College is committed to investing in the communities it serves. It is important that charitable donations by the College are free from any suspicion of corruption and bribery, whether direct or indirect. Given the College's own status as a charity, it will only be in exceptional circumstances that it will make charitable donations. The exceptions shall include donations to the City of Glasgow College Foundation and the Scottish Colleges Foundation.

4.5.2. A member of the Executive Leadership Team will authorise all such donations in line with the Financial Regulations and ensure that the donations are not made as an inducement for the purpose of obtaining any improper advantage or favour or for influencing a Public Official. Approved donations will be subject to an appropriate due diligence exercise.

4.5.3. The Chief Financial Officer will ensure the College's finance system separately identifies and records approved charitable donations.

4.5.4 These requirements apply where the estimated value is in excess of £50 for a one-off instance. Repeated instances of transactions less than £50 from to the same source which in total are over £100 must be recorded. Failure to record transactions might result in disciplinary action. Any queries about the contents of the register should be directed to the Associate Director of Governance and Risk.

4.6. Gifts and Hospitality

4.6.1. Board members and members of staff must not accept or offer any gift, reward or hospitality (explained hereafter) from any individual, company or organisation with whom they have contact in the course of their

College work as an inducement either for doing something or not doing something in their official capacity.

4.7. Accepting Gifts & Hospitality or Entertainment

4.7.1. Board members and members of staff **must**:

- Not create suspicion of any conflict between their official duty and their private interest;
- Not give the impression (to any member of the public, to any organisation with whom they deal or to their colleagues) that they have been (or may have been) influenced by a benefit to show favour or disfavour to any person or organisation;
- Not accept inducements which could lead to a contractual position between the College and a supplier, contractor or consultant;
- Not accept substantial offers (in excess of £100) of entertainment, invitations to social functions, travel or accommodation;
- Not normally accept tickets/invitations to sporting, cultural or social events, particularly from the same source. Given the nature of the College's business it may be necessary to accept invitations to such events. These should be approved in advance by the Board Chairperson for Board members or Principal and a member of the College's Executive Leadership Team for members of staff;
- Not accept excessive hospitality offered in substitution for fees for broadcasts, speeches, lectures or other work done; and
- Take care when offered any form of hospitality or gift from a person or organisation, which has, or is hoping to have, a contractual relationship with the College. If a Board member has any doubt, then he/she should consult with the Associate Director of Governance and Risk. In the absence of the Associate Director of Governance and Risk, Board members should contact the Board Chair, or the Vice Chair (Senior Independent Member). The Associate Director of Governance and Risk may seek further clarification, if required, from the College Development Network, or the College solicitors via the Director of Corporate Support. If a member of staff has any doubt about whether to accept hospitality

offered they should refer the matter to their line manager/supervisor, who in turn may discuss it with their senior manager.

4.7.2. The College accepts that members of staff or Board members may sometimes receive conventional gifts or hospitality. For example, commemorative items, corporate (branded) gifts, special event hospitality, working lunches, and other such gifts and hospitality that would not ordinarily be considered extravagant or disproportionate.

- Members of staff must, however, obtain the approval of their senior manager to accept the gift and record any gifts, hospitality or entertainment accepted in the College's register of gifts.
- Board members must record any gifts, hospitality or entertainment accepted in the College's register of gifts

4.7.3. These requirements apply where the estimated value is in excess of £50 for a one-off instance. Repeated instances of transactions less than £50 from the same source which in total are £100 or over must be recorded. Failure to record transactions might result in disciplinary action. Any queries about the contents of the register should be directed to the Associate Director Governance and Risk.

4.7.4. If, exceptionally, a member of the Executive Leadership Team agrees that there are circumstances that justify the normal level of hospitality being exceeded, this must be recorded in the register of gifts held by the Associate Director Governance and Risk. The College Register of Gifts is located on the College's network secure shared storage, accessible via the Executive Office administrative team, with the oversight of the Depute Principal.

4.8. Giving Gifts & Hospitality or Entertainment

4.8.1. The giving of reasonable hospitality, often in the form of food or drink to be consumed at an event or a business meeting, and the giving of promotional items, usually bearing the College's logo, are acceptable and should not give rise to any difficulty if kept within reasonable bounds

Board members and members of staff are:

- Prohibited from giving cash to Public Officials, clients or any third party (such as a supplier);
- Prohibited from giving cash gifts to more senior employees or Board members (this does not apply to gifts of cash where such gifts are made as part of normal office practice, e.g. as collections for wedding or leaving gifts); and
- Prohibited from offering gifts, entertainment or hospitality that they know or suspect will breach the gifts and entertainment policy of the relevant third party.

4.8.2. The College's register of gifts and hospitality should contain details of all gifts/entertainment offered and their monetary value as well as details of the approval routes for these. These requirements apply where the estimated value is in excess of £50 for a one-off instance. Repeated instances of transactions less than £50 to the same person/organisation must be recorded. Failure to record transactions might result in disciplinary action. Any queries about the contents of the register should be directed to the Associate Director of Governance and Risk.

4.9. Registration & Declaration of Interests

4.9.1. Open cultures are less conducive to bribery, corruption, fraud and irregularity than secretive ones. For this reason, the Second Report of the Committee on Standards in Public Life stressed the need for Board Members to declare and register their interests. The Associate Director of Governance and Risk will, therefore, maintain the Board's register of interest, which will be updated annually and published in the College's website.

4.9.2. There is also a need for senior managers to declare and register their interests where appropriate. Staff at many levels will have an opportunity to influence the choice of suppliers and contractors. Members of staff must, therefore, ensure that the selection of suppliers and contractors always reflects the best interests of the College, and not the personal or family interest of any member of the College. The Vice Principal of People & Corporate Support will, therefore, ensure a register of interest

records the relevant information about the College's senior managers and other resource managers. The register entry for each member of staff will be updated annually and checked by the relevant line manager plus a member of the Executive Leadership Team.

4.10. Anti Money Laundering

4.10.1. The Proceeds of Crime Act 2002 (revised), the Terrorism Act 2000 (revised 2026) and the Money Laundering Regulations 2017 (as amended), impose obligations on the College in respect of money laundering and associated activities. The definition of money laundering activities under the above legislation is wide and all companies and institutions, including the College, are subject to the legislation. Non-compliance with this legislation carries financial penalties and reputational consequences for both the College and its employees (including possible individual staff criminal prosecution that could result in up to 14 years imprisonment or a large fine).

4.10.2. Any member of staff could be potentially committing an offence if they suspect money laundering, become involved in some way, or do nothing about it. Disciplinary action under the College's procedures may be taken against any member of staff who fails to comply with College guidelines.

4.10.3. The purpose of these guidelines is to ensure that the College and its staff comply with the legislation and are aware of their respective obligations. The relevant procedures must be followed if an employee suspects that someone may be attempting to launder money.

4.10.4. It is particularly important that employees who are responsible for dealing with the receipt or outlay of funds, whether in the form of cash, cheque or bank transfer are familiar with these guidelines and that they act without delay if they suspect that money laundering is taking place.

4.11. Training and Awareness

4.11.1. The Associate Director of Governance and Risk will ensure that this Policy is communicated to all Board members and employees at least once per year.

4.11.2. The Vice Principal of People & Corporate Support will ensure that appropriate and regular training is established, updated and implemented for members of staff. Consideration of the appropriate level of training should also be given to those members of staff who are to be involved in higher-risk activities, either specifically or as part of other training and such higher-risk training will usually include case studies and practical small group seminars.

4.12. Consequences of Non-compliance

4.12.1. The penalties for contravention of the laws can include under the UK Bribery Act 2010 unlimited corporate fines, and for individuals unlimited fines plus up to ten years imprisonment. Penalties from more than one jurisdiction may also apply in a single case of bribery or corruption.

4.12.2. Failure to comply with this Policy may lead to:

- Criminal, civil or regulatory liabilities or penalties including fines and imprisonment;
- Serious reputational damage; and
- The unenforceability of contracts entered into by College.

4.12.3. Failure to comply with this Policy may lead to members of staff:

- Being held personally liable, such as fines or imprisonment potentially under the laws of more than one jurisdiction;
- Being subject to disciplinary action, up to and including dismissal; and
- Being subject to other sanctions imposed by regulators, including a ban from working in the financial services industry.

4.12.4. Any allegations of bribery made will be investigated in accordance with the College's Disciplinary Policy and Procedure. Such action may be

considered not only against those found to have perpetrated bribery, but also against those whose negligence may have facilitated it.

4.12.5. The Chairperson of the Audit and Assurance Committee will be kept informed of any bribery investigations and the resultant outcome. The Principal and the Audit and Assurance Committee Chairperson will be notified prior to any Police involvement.

5. Definitions

BRIBERY AND CORRUPTION GLOSSARY

The following definitions are intended to assist understanding of this Policy and are not intended to restrict or limit the application of the Policy.

5.1. **"Anything of Value"** means any advantage, financial or otherwise, and includes, but is not limited to money, loan, fee, stock, contractual right of interest, real estate, personal property, or other interests arising from business relationships, gifts, meals, entertainment, contributions or donations, including those made at the suggestion or direction of a Public Official, travel and travel related expenses, offers of employment or internships, below-market discounts, refunds, rebates, preferential treatment in the provision of, or preferential access to business opportunities, goods or services that does not have a commercially reasonable justification, or has other improper inducements.

5.2. **"Bribe" or "Bribery"** is the offer, promise, payment, transfer request for or receipt of Anything of Value, including a financial or other advantage, whether directly or indirectly, to or from any person, for that person (or any other person) to improperly perform any official or other duties, or breach any contractual or other obligations. A Bribe can take the form of a "reward" and be paid after the improper performance of the relevant duty or obligation has taken place. Bribery also occurs when a party offers Anything of Value e.g. gifts, entertainment or hospitality that they know or believe will breach the gifts and entertainment policy of the prospective

third party recipient or otherwise constitute the improper performance of a relevant function or activity of the third party.

5.3. **"Cash"** means any payment, or quasi-cash instrument, e.g. store vouchers, cheque made to cash or bearer, loans, gold or other precious metals or other easily liquidated asset, etc.

5.4. **"Corruption"** is the misuse of entrusted power or public office for private gain. This involves, on the one hand, offering or promising Anything of Value, including a financial or other advantage, whether directly or indirectly, to a Public Official to influence a Public Official. On the other hand, Corruption involves the demanding or accepting of Anything of Value, including a financial or other advantage, by a Public Official or private sector individual, as a condition to conferring business, obtaining a preferential position or other improper advantage whether directly or indirectly. Corruption is often associated with organised crime, money laundering and sometimes the financing of terrorism. Corruption may include 'kick-backs', i.e. payment of a proportion of a contract payment to an employee or representative of another contracting party.

5.5. **“Facilitation payment”** is a payment made to a public official to facilitate or expedite approval of some type of routine business transaction or activity.

5.6. **"Public Official"** means:

- any officer or employee of, or other person acting in an official capacity for a government, whether national, federal or local;
- any individual or group exercising a legislative, administrative or judicial function, whether appointed or elected, including officials exercising a public function on behalf of any entity controlled or owned by a government, including but not limited to central banks, sovereign wealth funds, state-run hospitals, any public international organisation and any business venture that is owned or controlled by a government entity;
- any candidate for or holder of public office;
- any official of a political party;
- any official or agent of a public international organization;
- any member of a royal family; and

- the relevant Public Official's close family members (e.g. spouse, children, parents, and siblings) and close associates (e.g. key business colleagues, personal advisers and legal entities owned or controlled by that person).

5.7. **"Third Party"** means any agent, representative, consultant, or other intermediary, associated with the College by providing it services or acting for or on behalf of the College, and includes (but is not limited to) consultants, finders, introducers, lobbyists (of any kind), tax advisers, lawyers, sales and marketing firms, outsourcers, charities, members of joint ventures in which the College has a minority stakeholding of less than 50% (excluding passive investments) and any organisation or partnership that the College may wish to acquire a stake in, whether as a controlling stakeholder or as a minority stakeholder (excluding passive investments).

5.8. **"Whistleblowing"** means in the context of the Public Interest Disclosure Act 1998 is the disclosure by an employee (or other party) about malpractice in the workplace. A whistleblower can blow the whistle about crime, civil offences (including negligence, breach of contract, etc), miscarriage of justice, danger to health and safety or the environment and the cover-up of any of these. It does not matter whether or not the information is confidential and Whistleblowing can extend to malpractice occurring in the UK and any other country or territory.

6. Responsibilities

Members of staff and Board members are:

6.1. Required to familiarise themselves with the College's anti-bribery policy;

6.2. Prohibited from offering, promising, or paying a bribe of any kind;

6.3. Prohibited from offering gifts, entertainment or hospitality that they know or believe will breach the gifts and hospitality policy of the relevant third party recipient;

6.4. Prohibited from accepting or soliciting a bribe of any kind (and must report any such offers);

6.5. Prohibited from accepting "Anything of Value" from a Public Official;

6.6. Prohibited from giving, offering, or transferring “Anything of Value” to a Public Official or to another person at the request or with the consent of a Public Official in order to influence a Public Official; and

Required to report any suspicion of corruption or bribery to a member of the College’s Executive Leadership Team or the Chairperson of the Audit and Assurance Committee. Alternatively the member of staff can follow the procedures set in the College’s Whistleblowing Policy.

The Audit and Assurance Committee of the Board will consider the suitability and effectiveness of this Policy. In addition, the Executive Leadership Team will establish adequate procedures to monitor the implementation and compliance with this Policy.

7. References

7.1. Policy Framework

Associated Policies and Procedures	Title
n/a	

7.2. Other College Policies and Procedures

Policy / Procedure	Title
Code of Conduct	Code of Conduct Policy
Financial Regulations	Financial Regulations
Procurement Policy	Procurement Policy
Procurement Procedures	Procurement Procedure
Fraud Prevention Policy	Fraud Prevention Policy
Whistleblowing Policy	Whistleblowing Policy

7.3. External References

Source	Title
Scottish Government	Scottish Public Finance Manual (2026) and Terrorism Act 2000

8. Document Control and Review

Approval Status	Approved
Approved by	Audit Committee
Date Approved	16th September 2026
EQIA Status	Initial Screening Conducted? Yes: ☒ No: ☐ Full EQIA Conducted? Yes: ☒ No: ☐
Proposed Review Date	September 2028
Lead Department	Finance
Lead Officer(s)	Chief Financial Officer
Board Committee	Audit Committee
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9. Revision Log

Version Date	Section of Document	Description of Revision
v1		Initial post-merger policy
v2		Overall review and update to reflect new structure
v3		Overall review and update to reflect new structure
v4	4.10	Anti-money laundering section added
v5		Overall review and update to reflect new structure
v6	4.2.3 Appendix 1	Added global Corruption Perceptions Index for individual countries
v7	Appendix 1 Various other amendments	Addition context global Corruption Perceptions Index

v8	3.3 Appendix 1	Added explicit reference to College group Updated global Corruption Perceptions Index
V9	 Appendix 1	Overall review and update to reflect new structure/Job Titles Added explicit reference to College group Updated global Corruption Perceptions Index
V10	General Appendix 1	Minor amendments to dates of amendments to legislation Updated global Corruption Perceptions Index to 2025 version

Appendix 1

Corruption Perceptions Index 2025
Produced annually by Transparency International

Extract from 2025 Report

Overview

The 2025 Corruption Perceptions Index (CPI) measures perceived levels of public-sector corruption in 182 countries and territories, drawing on 13 independent data sources and using a scale from 0 (highly corrupt) to 100 (very clean). This year, the global CPI average has dropped for the first time in more than a decade to just 42 out of 100.

The vast majority of countries are failing to keep corruption under control: 122 out of 182 score under 50 in the index. At the same time, the number of countries scoring above 80 has shrunk from 12 a decade ago to just five this year. In particular, there is a worrying trend of democracies seeing worsening perceived corruption – from the United States (64), Canada (75) and New Zealand (81), to various parts of Europe, like the United Kingdom (70), France (66) and Sweden (80).

Our research shows that corruption is not inevitable. Countries with long-term improvements in CPI scores have largely seen sustained effort from political leaders and regulators to implement broad legal and institutional reforms. Persistently low or declining CPI scores usually go hand in hand with limited or eroding democratic checks and balances, the politicisation of justice systems, undue influence over political processes, and a failure to safeguard civic space. It is not a surprise that countries with full democracies tend to score highly on the CPI, while non-democratic regimes largely perform the worst.

In most of the world's full autocracies, such as Venezuela (10) and Azerbaijan (30), corruption is systemic and manifests at every level. In almost two thirds of countries whose CPI scores have significantly declined since 2012, there has been a worrying pattern of restriction on freedoms of expression, association and assembly. In the last decade, politicised interference with the operations of non governmental organisations (NGOs) in countries such as Georgia (50),1 Indonesia (34),2 Peru (30)3 and Tunisia (39)4 has seen governments take actions such as introducing new laws to limit access to funding or even disband organisations that scrutinise and criticise them.

Such laws are often paired with smear campaigns and intimidation. In these contexts, it is harder for independent journalists, civil society organisations and whistleblowers to speak out against corruption freely. It is also more likely that corrupt officials can continue misusing their power

Corruption Perceptions Index 2025

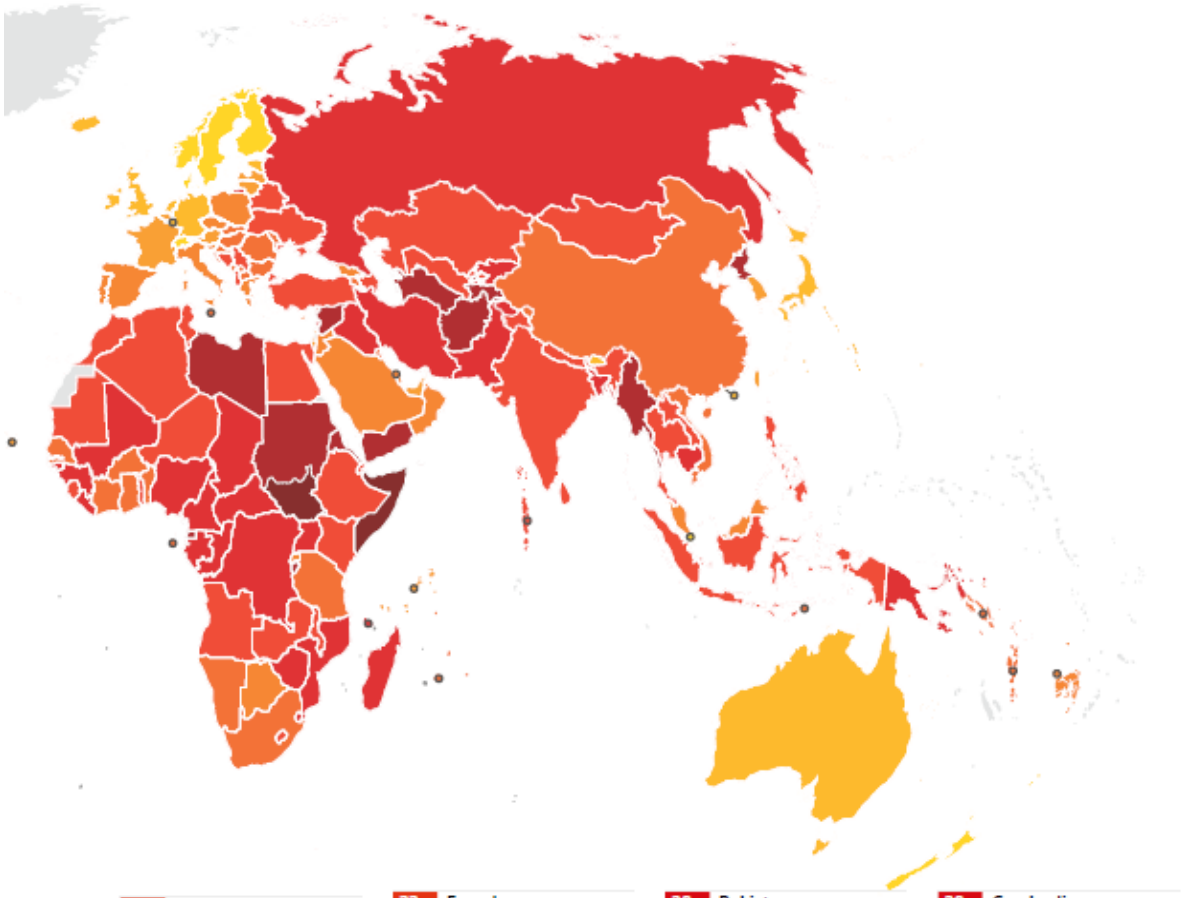
The index ranks countries according to the perceived levels of corruption in their public sectors, based on the views of experts and business people.

The perceived levels of public sector corruption in 182 countries and territories around the world.



SCORE	COUNTRY/TERRITORY
89	Denmark
88	Finland
84	Singapore
81	New Zealand
81	Norway
80	Sweden
80	Switzerland
78	Luxembourg
78	Netherlands
77	Germany
77	Iceland
76	Australia
76	Estonia
76	Hong Kong
76	Ireland
75	Canada
73	Uruguay
71	Bhutan
71	Japan
70	United Kingdom
69	Austria
69	Belgium
69	United Arab Emirates
68	Barbados
68	Seychelles
68	Taiwan
66	France
65	Lithuania
64	Bahamas
64	United States of America
63	Brunei Darussalam
63	Chile
63	Korea, South
63	Saint Vincent and the Grenadines
62	Cape Verde
62	Israel
60	Dominica
60	Latvia
59	Czechia
59	Saint Lucia
58	Botswana
58	Qatar
58	Rwanda
58	Slovenia
57	Saudi Arabia
56	Costa Rica
56	Grenada
56	Portugal
55	Cyprus
55	Fiji
55	Spain
53	Italy
53	Poland
52	Malaysia
52	Oman
50	Bahrain
50	Georgia
50	Greece
50	Jordan
49	Malta
48	Mauritius
48	Slovakia
47	Croatia
47	Vanuatu
46	Armenia
46	Kuwait
46	Montenegro
46	Namibia
46	Senegal
45	Benin
45	Romania
45	Sao Tome and Principe
44	Jamaica
44	Solomon Islands
44	Timor-Leste
43	China
43	Cote d'Ivoire
43	Ghana
43	Kosovo
42	Moldova
41	South Africa
41	Trinidad and Tobago
41	Vietnam
40	Bulgaria
40	Burkina Faso
40	Cuba
40	Guyana
40	Hungary
40	North Macedonia
40	Tanzania
39	Albania
39	India

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37	Zambia
36	Argentina
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36	Ukraine
35	Brazil
35	Sri Lanka
34	Algeria
34	Bosnia and Herzegovina
34	Indonesia
34	Laos
34	Malawi
34	Nepal
34	Sierra Leone

33	Ecuador
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33	Serbia
33	Thailand
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32	Philippines
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31	Belarus
31	Djibouti
31	Mongolia
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30	Azerbaijan
30	Egypt
30	Kenya
30	Mauritania
30	Peru
29	Gabon
28	Bolivia
28	Iraq
28	Liberia
28	Mali

28	Pakistan
27	Mexico
26	Cameroon
26	Guatemala
26	Guinea
26	Kyrgyzstan
26	Nigeria
26	Papua New Guinea
25	Madagascar
25	Uganda
24	Bangladesh
24	Central African Republic
24	Paraguay
23	Congo
23	Eswatini
23	Iran
23	Lebanon
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20	Cambodia
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15	Syria
14	Nicaragua
14	Sudan
13	Eritrea
13	Libya
13	Yemen
10	Venezuela
9	Somalia
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