



Global Banking School
+44 (0) 207 539 3548

info@globalbanking.ac.uk

www.globalbanking.ac.uk

891 Greenford Road, London
UB6 0HE

GBS Anti-Bribery and Corruption Policy

©2022 Global Banking School

Version Control

Document title	GBS Anti-Bribery and Corruption Policy
Version	V3.1
Approved by (Oversight Committee)	Board of Directors
Policy lead (Staff member accountable)	Head of HR
Date of original approval	February 2022
Date of last review	December 2024
Changes made at the last review:	Updated logo (December 2043)
Date effective from	December 2024
Date of next review	November 2026

Related policies

- GBS Data Protection Policy
- GBS Whistleblowing Policy
- GBS Staff Complaints Policy and Procedure
- GBS Student Complaints Policy and Procedure
- GBS Student Referral Policy
- GBS Equality and Diversity Policy
- GBS Student Protection Plan
- GBS Anti-Harassment and Anti-Bullying Policy

External Reference

1. Bribery Act Guidance published by the Ministry of Justice (<http://www.justice.gov.uk/downloads/legislation/bribery-act-2010-guidance.pdf>)
2. The Chartered Institute of Purchasing and Supply (CIPS) Corporate Code of Ethics (<https://www.cips.org/employers/ethical-services/corporate-code-of-ethics/>)
3. Serious Fraud Office (SFO) (<https://www.sfo.gov.uk/>)

Contents

1. Policy Statement and Scope	4
2. Ministry of Justice Anti-Bribery Act 2010	4
3. Definitions.....	4
4. Principles	5
5. Proportionate Procedures	6
6. Risk Assessment.....	6
7. Due Diligence	6
8. Communication.....	7
9. External Information Sources	7
10. Monitoring and Review.....	7
11. Data Protection and Confidentiality	8
12. Alternative Format.....	8

Global Banking School Anti-Bribery and Corruption Policy

1. Policy Statement and Scope

1.1. The purpose of this policy is to set out Global Banking School' (GBS) approach to Anti-Bribery and Corruption and to ensure that the policy meets the requirements of the UK Ministry of Justice Anti-Bribery Act 2010.

1.2. This policy applies to all staff, full-time, part-time, or contractual, and third parties associated with GBS.

2. Ministry of Justice Anti-Bribery Act 2010

2.1 This policy, based on the Anti-Bribery legislation (the Bribery Act 2010), requires that staff must not either directly or indirectly:

- (a) Offer, give, solicit, or accept any bribe, either in cash or any other form of inducement, to or from any person or company, wherever they are located and whether they are a public official or body, or private person or company.
- (b) Gain or retain any commercial, contractual, or regulatory advantage through unethical or illegal means when conducting business on behalf of GBS or its subsidiaries.

2.2 Staff and associated persons must understand and strictly comply with the UK Anti-Bribery laws in all countries of the world.

3. Definitions

3.1 **Bribery:** Bribery is the offer, promise, giving, demanding, or accepting of an advantage as an inducement for an action which is illegal, unethical, a breach of trust or the improper performance of a contract. Inducement can take the form of gifts, hospitality, fees, rewards, jobs, internships, examination grades, favours, or other advantages. It does not matter whether the bribe is given or received directly or through a third party or whether it is for the benefit of the recipient or some other person.

3.2 **Corruption.** Corruption is the misuse of entrusted power for personal gain.

3.3 Associated Person. An associated person provides services to GBS or acts on GBS' behalf and could be an employee of any type, consultants, agents and other forms of intermediaries and subsidiaries. Undergraduate and postgraduate students are not normally considered as associated persons unless they are themselves contracted by GBS to provide a service. However, research students are likely to be considered as associated persons in respect of the conduct of their research and for activities such as fieldwork.

3.4 Foreign or Government Official. A foreign or government official could include a public official, whether foreign or domestic; a political candidate or party official; a representative of government owned or majority-controlled organisation; or an employee of a public international organisation.

3.5 Facilitation Payments. Facilitation payments are unofficial financial payments or other advantages (either directly or indirectly) made to secure or expedite the performance of a routine or necessary action to which the payer of the facilitation payment has legal or other entitlement.

4. Principles

4.1 This policy applies to all of GBS's activities and operations and to all of its dealings and negotiations with third parties in all countries in which its employees, agents, partners and associates operate. All employees and individuals working on behalf of, under contract from or in collaboration with any part of GBS or with its employees are required to comply with this policy. This includes research students, as appropriate.

4.2 GBS has a zero-tolerance approach to bribery and corruption and as such, all forms of bribery and corruption are prohibited. A bribe does not actually have to take place – just promising to give or agreeing to receive a bribe is prohibited.

4.3 GBS will address risks of bribery by ensuring adequate and proportionate measures are developed and implemented to mitigate them.

4.4 Arrangements with third parties will be subject to clear contractual terms, including specific provisions requiring them to comply with minimum standards and procedures relating to bribery and corruption. GBS will not engage, or continue business with, any

individual or third party who we know or reasonably suspect of engaging in bribery or corruption.

4.5 No member of GBS staff or associated person will suffer penalty or other adverse consequences for refusing to pay bribes even if a refusal may result in loss of business or a delay in proceedings.

4.6 The prevention, detection and reporting of bribery are the responsibility of all staff. They should raise any concerns or allegations of bribery or corrupt activity with the Managing Director or report any such concerns to the Chief Executive Officer. Where staff feel they are not able to report in this way, they should report them through GBS Whistleblowing Policy.

4.7 GBS will ensure it takes appropriate action in response to any reported incidents of bribery or corruption. Investigations of bribery or corrupt activity will follow the principles and procedures set out in this policy. Failure to comply with this policy will lead to disciplinary action and proven allegations will lead to disciplinary action resulting in summary dismissal. In relevant cases, the police and the Serious Fraud Office (SFO) will be informed as certain offences carry criminal liability for individuals concerned and sanctions include significant fines and/or imprisonment.

5. Proportionate Procedures

5.1 GBS will ensure it has procedures in place to prevent bribery by staff and other persons associated with it, including research students as appropriate, which are proportionate to the bribery risks it faces and to the nature, scale, and complexity of GBS' activities.

6. Risk Assessment

6.1 GBS managers are responsible for ensuring risks are assessed and appropriate actions are taken to comply with this policy, including reporting the identified risks and implementation of actions within their reports and plans.

7. Due Diligence

7.1 GBS will apply due diligence procedures, taking a proportionate and risk-based approach, in respect of persons and organisations that perform or will perform services for or on behalf of GBS in order to mitigate identified bribery risks.

7.2 Where appropriate, GBS managers nominee will complete sufficient due diligence when entering into arrangements with others to ensure they are not acting corruptly and to periodically monitor their performance to ensure ongoing compliance. They will take appropriate action in respond to any information uncovered as a result of due diligence which gives rise to concern and report any such actions to the Managing Director.

8. Communication

8.1 GBS will ensure that its bribery prevention and associated policies and procedures are embedded and understood throughout the organisation through internal and external communication.

8.2 GBS managers are responsible for ensuring the communication of GBS Anti-Bribery and Corruption Policy and other relevant policies to associated person(s). GBS managers will also monitor and review their procedures and action plans to ensure their suitability, adequacy, and effectiveness in relation to this policy and implement improvements as appropriate.

9. External Information Sources

9.1 Bribery Act Guidance published by the Ministry of Justice (<http://www.justice.gov.uk/downloads/legislation/bribery-act-2010-guidance.pdf>)

9.2 For GBS staff with authority to place orders or issue contracts to suppliers or other third parties: The Chartered Institute of Purchasing and Supply (CIPS) Corporate Code of Ethics (<https://www.cips.org/employers/ethical-services/corporate-code-of-ethics/>)

9.3 For GBS staff who are members of professional bodies, their own codes of ethics with which they are required to comply.

10. Monitoring and Review

10.1 This policy may be amended by GBS at any time and will be reviewed annually to ensure it is fit for purpose by the Managing Director and be considered and approved by GBS Executive Board.

10.2 Any issues related to the monitoring and review of this policy, please contact asqo@globalbanking.ac.uk.

11. Data Protection and Confidentiality

11.1 GBS is registered with the Information Commissioner's Office as a Data Controller. Details of the School's registration are published on the [Information Commissioners website](#). GBS as a Data Controller shall implement appropriate technical and organisational measures to ensure that processing of personal information is performed in accordance with the UK General Data Protection Regulations (UK GDPR) and under the Data Protection Act 2018 (DPA).

11.2 GBS reserves the right and may be under a legal obligation to share information in exceptional circumstances where such disclosure is necessary to protect any individual or GBS staff, students, visitors from harm or to prevent a crime from taking place. All individuals involved in any process under this policy must keep information that is disclosed to them as part of the process, private and confidential.

12. Alternative Format

12.1 This policy can be provided in alternative formats (including large print, audio and electronic) upon request. For further information, or to make a request, please contact the Academic Standards and Quality Office at asqo@globalbanking.ac.uk.