

Board Meeting

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| Date of Meeting | Monday 28 October 2019 |
| Paper Title | Anti-Bribery Policy |
| Agenda Item | 9 |
| Paper Number | BM1-H |
| Responsible Officer | Jim Godfrey, Interim Executive Director |
| Status | Disclosable |
| Action | For approval |

1. Report Purpose

1.1. This paper provides a review of the Anti-Bribery policy for GCRB.

2. Recommendations

2.1. The Board is invited to **approve** the revised policy.

3. Background

3.1. In accordance with the Bribery Act 2010, GCRB is required to have such a policy.

3.2. The original policy was approved by GCRB in June 2017. The policy has been reviewed and revised version produced. The policy has been expanded to provide further detail and is consistent with the approach used by others within the college sector.

3.3. The policy was considered by the GCRB Audit Committee on 8 October 2019 and recommended to the Board for approval.

4. Risk Analysis

4.1. The risk of bribery within GCRB is considered to be low. However, this policy affirms the commitment of GCRB to the highest ethical standards and communicates its position. This policy reduces the risk that 'There is a breach of legislation/guidance/code of practice and this results in a failure of governance' (Risk 013).

5. Equalities Implications

5.1. There are no equalities implications arising from this report.

6. Legal Implications

6.1. Approval of the attached policy will ensure that GCRB is compliant with relevant legislation, good practice and the Scottish Public Finance Manual.

7. Resource Implications

7.1. There are no specific financial implications arising from the proposed policy.

8. Strategic Plan Implications

8.1. Through the conditions of grant associated with the Regional Outcome Agreement, GCRB is required to conduct its affairs in accordance with the expected standards of good governance, which include establishing appropriate arrangements in relation to Anti-Bribery.