



PG01 Anti-Bribery and Corruption

Version Date: _____ September 2020

Review Date: _____ August 2023

1.0 Introduction

- 1.1 It is North East Scotland College's 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 business dealings and relationships wherever we operate and implementing and enforcing effective systems to counter bribery and corruption.
- 1.2 This Policy should be read in conjunction with our Anti-Bribery and Corruption Statement, and Conflict of Interest Procedure which are attached at Annexes A and B.
- 1.3 The College will uphold all laws relevant to countering bribery and corruption. We remain bound by UK laws, including the Bribery Act 2010, in respect of our conduct both at home and abroad.

2.0 About this policy

- 2.1 The purpose of this policy is to:
 - (a) provide further details of the College's position, as set out in the Anti-Bribery & Corruption Statement at Annex B, including details of our responsibilities, and of those working for us, in observing and upholding our position on bribery and corruption; and
 - (b) provide information and guidance to those working for us on how to recognise and deal with bribery and corruption issues.
- 2.2 It is a criminal offence to offer, promise, give, request, or accept a bribe. Individuals found guilty can be punished by up to ten years' imprisonment and/or a fine. As an employer if we fail to prevent bribery we can face an unlimited fine, exclusion from tendering for public contracts, and damage to our reputation. We therefore take our legal responsibilities very seriously.
- 2.3 The College has established detailed risk management procedures to prevent, detect and prohibit bribery. The College will conduct risk assessments for each of its key business activities on a regular basis and, where relevant, will identify employees or officers of the College who are in positions where they may be exposed to bribery.
- 2.4 In this policy, **third party** means any individual or organisation you come into contact with during the course of your work for us, and includes actual and potential clients, customers, suppliers, distributors, business contacts, agents, advisers, and government and public bodies, including their advisors, representatives and officials, politicians and political parties.
- 2.5 This policy has been implemented following consultation with the Local Joint Negotiating Committee.
- 2.6 This policy does not form part of any employee's contract of employment and we may amend it at any time.

3.0 Who must comply with this policy?

This policy applies to all persons working for the College or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives and business partners, sponsors, or any other person associated with us, wherever located.

4.0 Who is responsible for the policy?

4.1 The Regional Board has overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it.

4.2 Vice Principal Finance & Resources has primary and day-to-day responsibility for this policy. The internal audit programme will provide assurance on the effectiveness of the internal control systems and procedures to counter bribery and corruption.

4.3 Management at all levels are responsible for ensuring those reporting to them understand and comply with this policy.

4.4 Managers will receive adequate and regular briefings as appropriate.

5.0 What is Bribery and Corruption?

5.1 **Bribery** is offering, promising, giving or accepting any financial or other advantage, to induce the recipient or any other person to act improperly in the performance of their functions, or to reward them for acting improperly, or where the recipient would act improperly by accepting the advantage.

5.2 An **advantage** includes money, gifts, loans, fees, hospitality, services, discounts and the award of a contract or anything else of value.

5.3 A person acts **improperly** where they act illegally, unethically, or contrary to an expectation of good faith or impartiality, or where they abuse a position of trust. The improper acts may be in relation to any business or professional activities, public functions, acts in the course of employment, or other activities by or on behalf of any organisation of any kind.

5.4 **Corruption** is the abuse of entrusted power or position for private gain.

Examples: -

Offering a bribe

A member of the faculty offers an external inspector tickets to a major sporting event, but only if they agree to rate the College highly as part of their review.

This would be an offence as the member of staff is making the offer to gain a commercial advantage. The College may also be found to have committed an offence because the offer has been made to obtain business for us. It would also likely be an offence for the external inspector to accept the offer.

Receiving a bribe

The procurement manager of the College – who is currently involved in a tender process for services to be provided to the College – is approached by the College's current supplier and offered a two night break in an expensive hotel.

In return the supplier expects the procurement manager to use their influence in the College to ensure it continues to do business with them. It is an offence for a supplier to make such an offer. It would be an offence for the procurement manager to accept the offer as it would be doing so to gain a personal advantage.

Bribing a foreign official

Whilst on a field trip abroad, a member of staff arranges for the College to pay an additional "facilitation" payment to an immigration official to enable students to move through customs more quickly.

The offence of bribing a foreign public official is committed as soon as the offer is made. This is because it is made to gain a business advantage for the College. We may also be found to have committed an offence.

6.0 What you must not do

6.1 It is not acceptable for you (or someone on your behalf) to:

- (a) Give, promise to give, or offer, a payment, gift or hospitality with the expectation or hope that a business advantage will be received, or to reward a business advantage already given;
- (b) Give or accept a gift or hospitality during any commercial negotiations or tender process, if this could be perceived as intended or likely to influence the outcome;
- (c) Accept a payment, gift or hospitality from a third party that you know or suspect is offered with the expectation that it we will provide a business advantage for them or anyone else in return;
- (d) Accept hospitality from a third party that is unduly lavish or extravagant under the circumstances;
- (e) Offer or accept a gift to or from government officials or representatives, or politicians or political parties, without the prior approval of the Vice Principal Finance & Resource;
- (f) Threaten or retaliate against another individual who has refused to commit a bribery offence or who has raised concerns under this policy; or
- (g) Engage in any other activity that might lead to a breach of this policy.

7.0 Facilitation payments and kickbacks

7.1 The College does not make, and will not accept, facilitation payments or "kickbacks" of any kind.

7.2 **Facilitation payments**, also known as "back-handers" or "grease payments", are typically small, unofficial payments made to secure or expedite a routine or necessary action

(for example by a government official). They are not common in the UK, but are common in some other jurisdictions.

7.3 **Kickbacks** are typically payments made in return for a business favour or advantage.

7.4 You must avoid any activity that might lead to a facilitation payment or kickback being made or accepted by us or on our behalf, or that might suggest that such a payment will be made or accepted. If you are asked to make a payment on behalf of the College, you should always be mindful of what the payment is for and whether the amount requested is proportionate to the goods or services provided. You should always ask for a receipt which details the reason for the payment. If you have any suspicions, concerns or queries regarding a payment, you should raise these with the Vice Principal Finance & Resource.

8.0 Gifts, hospitality and expenses

8.1 This policy allows reasonable and appropriate hospitality or entertainment given to or received from third parties, for the purposes of:

- (a) Establishing or maintaining good business relationships;
- (b) Improving or maintaining our image or reputation; or
- (c) Marketing or presenting our products and/or services effectively.

8.2 The giving and accepting of gifts is allowed if the following requirements are met:

- (a) It is not made with the intention of influencing a party to obtain or retain business or a business advantage, or to reward the provision or retention of business or a business advantage, or in explicit or implicit exchange for favours or benefits;
- (b) It is given in the College's name, not in your name;
- (c) It does not include cash or a cash equivalent (such as gift certificates or vouchers);
- (d) It is appropriate in the circumstances, taking account of the reason for the gift, its timing and value. For example, in the UK it is customary for small gifts to be given at Christmas; and
- (e) It is given openly, not secretly;
- (f) It complies with any applicable local law.

8.3 Promotional gifts of low value such as branded stationery to or from existing customers, suppliers and business partners will usually be acceptable.

8.4 Reimbursing a third party's expenses, or accepting an offer to reimburse our expenses (for example, the costs of attending a business meeting) would not usually amount to bribery. However, a payment in excess of genuine and reasonable business expenses (such as the cost of an extended hotel stay) is not acceptable.

8.5 The test to be applied is whether in all the circumstances the gift, hospitality or payment is reasonable and justifiable. The intention behind it should always be considered. If a member of staff is unsure of the propriety of any offer of a gift or hospitality or

entertainment, he/she should take advice from a member of the Senior Executive Team.

8.6 It has become quite usual in colleges for some students to offer small presents to staff at the end of a course. These may come from the class group and may be a natural expression of gratitude. Sometimes gifts may be given by individuals. However it is very important that, in an internally-assessed system, any gift cannot be perceived or portrayed as possibly having influenced decisions taken. As such, staff should only accept gifts if they are clear that doing so does not impinge on their professional integrity. Any gifts received should be tokens of appreciation, rather than anything of substantial value. Any items of substantial value that are offered should be declined politely, or if this is not possible, the member of staff should refer to his/her line manager to ensure that there is transparency in the matter.

9.0 Conflicts of Interest

9.1 Employees who have concerns that there is a possibility that conflict of interest may arise in relation to their own area of work will need to record any concerns. Examples where such conflicts may arise include:

- Executive and non-executive directorships
- Licensing of intellectual property
- Outside employment and consultancy
- Close person relationships by staff involved in promotion or appointment of other staff
- Teaching and assessment of close relatives.

9.2 The Conflict of Interests Procedure attached at Annex A should be referred to and the form completed and authorised where conflicts do arise.

10.0 Donations

10.1 The College does not make contributions to political parties.

10.2 The College does not make charitable donations.

11.0 Record-keeping

11.1 The College must keep financial records and have appropriate internal controls in place which will evidence the business reason for making payments to third parties.

11.2 You must declare and record all hospitality or gifts given or received, which are out with the allowable limits identified in this Policy in the Central Register held by the Secretary to the Board which will be subject to managerial review.

11.3 You must submit all expenses claims relating to hospitality, gifts or payments to third parties in accordance with our expenses policy and record the reason for expenditure.

11.4 All accounts, invoices, and other records relating to dealings with third parties including suppliers and customers should be prepared with strict accuracy and

completeness. Accounts must not be kept "off-book" to facilitate or conceal improper payments.

12.0 Your responsibilities

- 12.1 You must ensure that you read, understand and comply with this policy.
- 12.2 The prevention, detection and reporting of bribery and other forms of corruption are the responsibility of all those working for us or under our control. You are required to avoid any activity that might lead to, or suggest, a breach of this policy.
- 12.3 You must notify the College as soon as possible if you believe or suspect that a conflict with this policy has occurred, or may occur in the future. For example, if a client or potential client offers you something to gain a business advantage with us, or indicates to you that a gift or payment is required to secure their business. Further "red flags" that may indicate bribery or corruption are set out in clause 17.0.

13.0 How to raise a concern

- 13.1 You are encouraged to raise concerns about any issue or suspicion of bribery or corruption at the earliest possible stage.
- 13.2 If you are offered a bribe, or are asked to make one, or if you believe or suspect that any bribery, corruption or other breach of this policy has occurred or may occur, you must report it in accordance with our Whistleblowing Policy as soon as possible.
- 13.3 If you are unsure about whether a particular act constitutes bribery or corruption, raise it with your manager or the Vice Principal Finance & Resources.

14.0 Protection

- 14.1 Individuals who refuse to accept or offer a bribe, or who raise concerns or report another's wrongdoing, are sometimes worried about possible repercussions. We aim to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken.
- 14.2 The College is committed to ensuring no one suffers any detrimental treatment as a result of refusing to take part in bribery or corruption, or because of reporting in good faith their suspicion that an actual or potential bribery or other corruption offence has taken place, or may take place in the future. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If you believe that you have suffered any such treatment, you should inform the Director of People Services immediately. If the matter is not remedied, and you are an employee, you should raise it formally using our Grievance Procedure, which can be found on the Intranet.

15.0 Training and communication

- 15.1 Briefings on this policy form part of the induction process for all individuals who work for us, and regular updates will be provided as necessary.

15.2 Our zero-tolerance approach to bribery and corruption must be communicated to all suppliers, contractors and business partners at the outset of our business relationship with them and as appropriate thereafter.

16.0 Breaches of this policy

16.1 Any employee who breaches this policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct.

16.2 We may terminate our relationship with other individuals and organisations working on our behalf if they breach this policy.

17.0 Potential risk scenarios: "red flags"

17.1 The following is a list of possible red flags that may arise during the course of you working for us and which may raise concerns under various anti-bribery and anti-corruption laws. The list is not intended to be exhaustive and is for illustrative purposes only.

If you encounter any of these red flags while working for us, you must report them promptly:

- (a) You become aware that a third party engages in, or has been accused of engaging in, improper business practices;
- (b) A third party insists on receiving a commission or fee payment before committing to sign up to a contract with us, or carrying out a government function or process for us;
- (c) A third party requests payment in cash and/or refuses to sign a formal commission or fee agreement, or to provide an invoice or receipt for a payment made;
- (d) A third party requests that payment is made to a country or geographic location different from where the third party resides or conducts business;
- (e) A third party requests an unexpected additional fee or commission to "facilitate" a service;
- (f) A third party demands lavish entertainment or gifts before commencing or continuing contractual negotiations or provision of services;
- (g) A third party requests that a payment is made to "overlook" potential legal violations;
- (h) A third party requests that you provide employment or some other advantage to a friend or relative;
- (i) You receive an invoice from a third party that appears to be non-standard or customised;
- (j) A third party insists on the use of side letters or refuses to put terms agreed in writing;
- (k) You notice that we have been invoiced for a commission or fee payment that appears large given the service stated to have been provided;
- (l) A third party requests or requires the use of an agent, intermediary, consultant, distributor or supplier that is not typically used by or known to us;
- (m) You are offered an unusually generous gift or offered lavish hospitality by a third party.

Status:	Final	Summary of changes Updated terminology
Approved by:	Executive Team	
Date of version:	September 2020	
Responsibility for Policy:	Vice Principal Finance & Resources	
Responsibility for Review:	Vice Principal Finance & Resources	
Review date:	August 2023	
DPIA date:	August 2020	
EIA date:	August 2020	

DATA PROTECTION IMPACT ASSESSMENT (DPIA)

1. Does the activity that this policy or procedure relates to use personal data in any way? (Use may refer to collecting and gathering; storing electronically; storing by paper; sharing with other parties (internal or external to college); use of images as well as written information; retaining and archiving; or erasing, deleting and destroying)	No
2. Does the activity that this policy or procedure relates to use special category personal data in any way? (Special category data is data about: race; ethnic origin; politics; religion; trade union membership; genetics; biometrics (where used for ID purposes); health; sex life; or sexual orientation)	No
3. Does the activity that this policy or procedure relates to involve the use of social media or a third-party system?	No

If the answer is 'yes' to one or more of the above questions, the Data Protection Officer must be consulted.

Date of DPO consultation:	N/A
Description of outcome and actions required (if any):	
DPIA screening/full DPIA required:	No

EQUALITY IMPACT ASSESSEMENT (EIA)

Part 1. Background Information

Title of Policy:	Anti-Bribery & Corruption Policy
Person Responsible:	Vice Principal Finance & Resources
Date of Assessment:	August 2020
What are the aims of the Policy?	To provide further details of the College's position, as set out in the Anti-Bribery & Corruption Statement, including details of our responsibilities, and of those working for us, in observing and upholding our position on bribery and corruption; and to provide information and guidance to those working for us on how to recognise and deal with bribery and corruption issues.
Who will this Policy impact upon?	All persons working for the College or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives and business partners, sponsors, or any other person associated with us, wherever located

Part 2. Public Sector Equality Duty Comparison

(Consider the proposed action against each element of the PSED and describe potential impact, which may be positive, neutral or negative. Provide details of evidence.)

Need	Impact	Evidence
Eliminating unlawful discrimination, harassment and victimisation	Neutral	There is no impact on those with protected characteristics adverse or positive as this policy is intended to ensure that all persons working for the College are aware of their responsibilities and that proper controls are in place to prevent and detect bribery and corruption.
Advancing Equality of Opportunity	Neutral	As above.
Promoting good relations	Neutral	As above.

Part 3. Action & Outcome (Following initial assessment, describe any action that will be taken to address impact detected)

No action is required.

Sign-off *	
Name:	Pete Smith
Position:	Vice Principal Finance & Resources
Date of original EIA:	July 2015
Date EIA last reviewed:	August 2020

**Please note that an electronic sign-off is sufficient*

ANNEX A – CONFLICT OF INTEREST PROCEDURE

1. Introduction

- 1.1 This document sets out the procedures for managing and/or declaring a conflict of interest situation within the College.
- 1.2 North East Scotland College is an institution of public trust and all members of staff must conduct their affairs in ways that will not compromise the integrity of the College.
- 1.3 The purpose of this document is to give individuals the opportunity to record any concerns they may have in relation to the possibility that a conflict of interest could arise in their own area of work. In officially acknowledging any such possibility, the individual is reassured that the College is aware of the situation and that appropriate action, if any is needed, will be taken; this is very often all that is required to allay both the individual's sense of vulnerability and College concerns.
- 1.4 This procedure is designed to:
 - Heighten the awareness of members of staff about situations that may generate conflicts of interest;
 - Provide means for members of staff and the College to manage potential and real conflicts of interest; and
 - Ensure that activities undertaken are in the best interests of students, staff and the College as a whole.

2. Definitions

- 2.1 'Conflict of Interest' is defined as any situation in which an individual's obligations to the College differ from his obligations to any third party, from the individual's personal interests or from those of his immediate family, whether financial or otherwise, and when those other obligations and interests may, or may be perceived, to influence the individual's performance of his/her obligations to the College.
- 2.2 Situations that may give rise to a conflict of interest include, but are not limited to:
 - Executive and non-executive directorships
 - Licensing of intellectual property
 - Outside employment and consultancy
 - Close person relationships by staff involved in promotion or appointment of other staff
 - Teaching and assessment of close relatives

3. Why there is a requirement for a Conflict of Interest Procedure?

- 3.1 The risk of conflict of interest arises when there is a divergence, or possible divergence, between an individual's private interest, or the interests of any third party with whom, or with which, the individual is associated or connected, and his/her obligations to the institution, such that an independent observer might reasonably question whether the

individual's actions or decisions are determined by considerations of personal gain, financial or otherwise, to the member of staff or associated or connected third party.

- 3.2 Conflicts of interest are common in a modern institution and may arise in relation to internal or external situations, as well as the character or actions of individuals.
- 3.3 For the purposes of this procedure, conflicts of interest may arise typically, but not exclusively, in the context of learning and teaching, assessments/examinations, external examining, staff and/or student close personal relationships, finance, discipline, appointment of staff, promotion, procurement, research, consultancy, intellectual property and commercialisation.

4 Management of relationships with companies or other third parties that supply goods and services to the College.

- 4.1 All relationships that members of staff have with companies or other third parties that supply goods and services to the College must be managed in accordance with the Financial Regulations of the College.

5 Procedure Implementation

- 5.1 As part of the compliance procedures, each member of staff must disclose, to their knowledge, their activities for, and financial interests in, organisations out with the College, where these same organisations support or have input into their College's teaching activities.
- 5.2 Conflicts of interest of a non-financial nature should also be disclosed. For example, if a member of staff has a family member studying within the College and has access to exam papers of that school through their position with the College, or if a member of staff has written a textbook and wishes to recommend that textbook as a preferred textbook for a course they are teaching.
- 5.3 Close relationships should also be declared by staff involved in promotion or appointment of other staff.
- 5.4 The information disclosed by a member of staff will be held in complete confidence and will not be used for any purposes other than for compliance with this procedure.
- 5.5 Any compliance forms that show a conflict of interest shall be reviewed by the appropriate Senior Manager with the Director of People Services, and an appropriate course of action agreed upon. Such a course of action may require further information being sought from the member of staff. The form will not be approved until the Director of People Services is satisfied that there is no conflict of interest, or that appropriate steps have been taken to manage the conflict of interest. A brief statement of the steps taken to manage the conflict of interest should be attached to the compliance form, and the member of staff informed by the appropriate Manager of the steps that they must follow.
- 5.6 If a member of staff's circumstances change during the year, a new compliance form shall be completed as soon as possible after the member of staff is aware of the changes in circumstance.

- 5.7 Appeals of decisions should be made to the Vice Principal Finance and Resources, in writing.
- 5.8 Failure to: complete a compliance form; revise it if circumstances change; or review it annually; and submission of a compliance form which has been deliberately completed in an incorrect or misleading way shall constitute a disciplinary offence and shall be dealt with accordingly.

CONFLICT OF INTEREST DISCLOSURE FORM

**NORTH EAST SCOTLAND COLLEGE
REGISTER OF INTERESTS
COMPLIANCE WITH CONFLICT OF INTEREST PROCEDURE FORM**

Name:			
Job Title:			
Department:			

YES	NO	PLEASE ANSWER THE FOLLOWING QUESTIONS:
		Is there any relationship, either internal or external, which you feel could cause potential or apparent conflict of interest with your College activities? If yes, please provide further details of the relationship below:
		Q1. Have you performed consultancy work or engaged in any other paid work in the last academic year other than that which has been pre-approved?
		Q2. Do you have outside activities that involve NESCol students?
		Q3. To your knowledge, do you or any member of your immediate family have a significant or influential relationship with (or a financial interest when aggregated for your immediate family in) any other the following: <ul style="list-style-type: none"> - A third party that tests, markets or manufactures a product which could be evaluated or developed further through your research activities? - A third party, whose actions you are in a position to influence, which does business with NESCol? - A sponsor or collaborator involved with research projects? - Any other business in which there could be a conflict of interest?
		Q4. Do you hold any position or appointment as a Director (Executive or Non-executive) or Company Secretary in any company, whether or not this company does business with NESCol?
		Q5. Are you aware of any other circumstances that could constitute a conflict of interest with your position within the College?

If you have answered 'YES' to any of the questions above, please give full details overleaf.

Q1 & Q2: For consultancy and other outside activities, please list the organisation(s) you have worked for, the duties performed and the time spent on the activity.

Q3: Please give details of the relationship or financial interest. Examples: "Son, MD of Company X, sponsor of research project Z (cash contribution £Y)" or "My son is a student in the School of Management and I manage printing of examination papers for that school". Specific shares data or values are not required.

Q4: Directorships/Company Secretary positions: Give date of appointment, name & address of company and state if company is involved IN ANY WAY with your research activities e.g. studentship provision, in-kind support, cash contributions, collaborator etc.

Q5: Give details of any other conflict of interest with your position within the College that you are aware of.

I confirm that this form has been completed to the best of my knowledge and that the information contained on this form is true and correct. I understand that if the information is later found to be false I may be subject to disciplinary proceedings.

I understand that as a public authority under the Freedom of Information (Scotland) Act 2002(FOISA), the College may be required to disclose information I have submitted to the register of interests.

Signed:

Date:

Reviewed by Senior Manager				
Approved by Senior Manager	YES		NO	
Signed:			Date:	
Approved by Director of People Services	YES		NO	
Signed by Director of People Services			Date	

***On completion this form must be returned to the People Services Team at Aberdeen City Centre campus.**

ANNEX B - ANTI-BRIBERY AND CORRUPTION STATEMENT

Introduction

The Regional Board of North East Scotland College (the **College**) recognise that bribery and corruption has a detrimental effect on communities wherever they occur. Corrupt acts expose the College and its employees to the risk of prosecution, fines and imprisonment, as well as endangering the College's reputation.

It is the College's policy to comply with all anti-bribery and corruption laws. In line with the requirements of the UK Bribery Act 2010, the College has taken steps to introduce "adequate procedures" which are rigorously applied and reviewed to ensure that we are fully compliant.

It is the College's policy to maintain the highest level of ethical standards in the conduct of its business affairs and the College has a zero tolerance towards bribery and corruption.

Scope

The College's zero tolerance of bribery and corruption is intended to be all encompassing. It applies to all members, officers, directors, employees, agency/seconded workers, volunteers, interns, as well as any agents, contractors, external consultants, third-party representatives or other parties acting on behalf of the College or any subsidiary, of which the College has effective control, in any country that we operate. The College has developed a detailed internal policy setting out the expectations on, and responsibilities of, everyone working for or on behalf of the College.

The College also expects our business partners, sponsors, suppliers, contractors or any other person associated with us to act with integrity, and not be involved in bribery and/or corruption. We will, where appropriate, include clauses to this effect in relevant contracts.

The Statement

The College has prepared the following Anti-Bribery statement setting out clearly its position in relation to bribery and corruption.

The Regional Board of North East Scotland College prohibits: the offering, the giving, the solicitation or the acceptance of any bribe, whether cash or other inducement to or from any person or company, wherever they are situated and whether they are a public official or body or private person or company by any individual employee, agent or other person or body acting on North East Scotland College's behalf in order to gain any commercial, contractual or regulatory advantage for North East Scotland College in a way which is unethical or in order to gain any personal advantage, financial or otherwise, for the individual or anyone connected with the individual.

Responsibility

The Principal has lead responsibility for compliance with the College's obligations under the Bribery Act 2010 and this statement is signed by the Principal to demonstrate the Regional Board's commitment.

N Cowie
Principal and Chief Executive
North East Scotland College