Beacon Plus College

Final

# Anti-Bribery and Fraud Policy

September 2026

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**Policy Statement:**

Beacon Plus aims to maintain a culture of honesty and openness in all of its dealings, with opposition to bribery, fraud and corruption in any form.

Beacon Plus therefore aims to promote an organisational culture which encourages the prevention of bribery and fraud by raising awareness of the need for high standards of personal conduct.

The purpose of this policy is to convey to all staff, learners, Governors and interested parties the rules in relation to Beacon Plus's unequivocal stance towards the eradication of bribery and fraud and our commitment to ensuring that Beacon Plus conducts its business in a fair, professional, ethical and legal manner.

The policy applies to all staff and governors at Beacon Plus, While learners are expected to uphold the values of honesty and integrity, the detailed provisions of this policy are primarily directed at staff, governors, and third-party contractors. Learners should also be aware that bribery, fraud and corruption will not be tolerated at Beacon Plus. It also extends to anyone working for or on our behalf such as those engaged by us on a self-employed basis including suppliers, contractors, subcontractors or any other related third party. Learners on work placements may be subject to anti-bribery and fraud policies within their place of work; this will be discussed with them with the employer and Work Placement Coordinator.

The Board of Governors are responsible for the oversight of relevant policies and procedures related to bribery and fraud and the maintenance of good business standards (internal systems and controls are in place).

**Anti-Bribery**

Beacon Plus works in accordance with the Bribery Act 2010. Beacon Plus also considers relevant guidance issued by the UK Government and the Serious Fraud Office in interpreting and applying the Bribery Act and its provisions apply to all activities and to all staff, Governors and Directors of Beacon Plus. The Bribery Act

holds businesses and institutions liable for failing to prevent bribery carried out on their behalf, irrespective of whether the bribe takes place in the UK or overseas. Bribery can be the offering or accepting of any gift, loan, payment, reward or advantage for personal gain as an encouragement to do something which is dishonest, illegal or a breach of trust.

Bribery is a criminal offence and Beacon Plus prohibits any form of bribery in its business dealings. Integrity and transparency are of utmost importance to Beacon Plus and we have a zero-tolerance stance towards corrupt activities of any kind, whether committed by staff, learners or by third parties acting for or on behalf of Beacon Plus.

It is prohibited to offer, give, request or accept (directly or indirectly) any bribe to or from any person (including learners) or company in order to gain commercial, contractual or regulatory advantage for Beacon Plus, or in order to gain any personal advantage for an individual or anyone connected with the individual in a way that is unethical.

If you, as a member of staff or person working on our behalf, suspect that an act of bribery, or attempted bribery, has taken place, even if you are not personally involved, you are expected to report this in accordance with the procedures detailed in section 3 of this policy. You may be asked to give a written account of events.

Appropriate checks will be made before engaging with suppliers or other third parties of any kind to, amongst other reasons, reduce the risk of our business partners breaching our antibribery rules. Beacon Plus will ensure that all of its transactions, including any sponsorship or donations given to charity, are made transparently and legitimately. Beacon Plus will take any actual or suspected breach of this policy extremely seriously and will carry out a thorough investigation should any instances arise. Beacon Plus will uphold laws relating to bribery and will take disciplinary action against any individual, or other relevant action against persons working on our behalf or in connection with us, should we find that an act of bribery, or attempted bribery, has taken place. This action may result in dismissal if you are a member of staff, exclusion if you are a learner or the cessation of our arrangement with you if you are self-employed, an agency worker, contractor etc.

Staff are reminded of Beacon Plus's Whistleblowing policy. This encourages staff to inform management if they are concerned about serious malpractice, fraud or corruption, and protects staff from victimisation, harassment or disciplinary action as a result of any disclosure, where this is made in the public interest and is not made maliciously or for personal gain.

Beacon Plus prohibits facilitation payments. Staff, governors, contractors and any persons acting on behalf of Beacon Plus must not make or receive facilitation payments regardless of local custom or practice.

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## Anti-Bribery Procedures

## Gifts and Hospitality

A gift is defined by Beacon Plus as any item, cash, goods or service offered for personal benefit.

Hospitality is defined as any generous material welcome or reception such as lunch, events and trips.

Beacon Plus realises that the giving and receiving of gifts and hospitality where nothing is expected in return helps form positive relationships with third parties and can be of benefit to learners. This will be proportionate and properly recorded, does not constitute bribery and consequently such actions are not considered a breach of this policy.

### Giving of gifts and hospitality

Beacon Plus may provide hospitality in connection with its business affairs. The hospitality may be provided to Directors; staff; representatives from firms or companies visiting Beacon Plus premises on business or any other visitors connected with the business of Beacon Plus. The hospitality provided should normally not exceed the provision of tea/coffee/sandwiches or lunch. The recipient should be conscious of the need to avoid a position where he/she might be or appear to be influenced in deciding by such hospitality.

### Receiving gifts and hospitality

Where a situation arises when a member of staff is uncertain whether it would be appropriate to accept an offer of a gift or hospitality, the offer should be declined or advice sought from the College Business Manager. Personal inducement in any form from suppliers of goods and services must never be accepted. Any such offers must be reported to the College Principal, College Business Manager or Directors. Gifts or hospitality must be declined where the offering party is involved in a tender process with Beacon Plus. Below are examples of gifts and hospitality:

- Non-cash Gifts - Gifts which are small and inexpensive in nature such as pens, flowers, chocolates, calendars or diaries may be accepted. However, if the total value exceeds £50.00 it must be reported to the Directors. Non-cash gifts which have a higher value such as electronics and alcohol should not be accepted and the offer should be reported to the Directors.
- Cash or Cash Equivalents - Cash or cash equivalents include cash in any currency, lottery tickets, gift vouchers should not be accepted under any circumstances, digital gifts such as e-vouchers, online subscriptions, or virtual event access are considered equivalent to physical gifts and must be treated in accordance with this policy.
- Trade Discount Cards - Trade discount cards, other than those negotiated by

Beacon Plus on behalf of its staff, by which an employee may benefit from the purchase of goods or services at a discounted price are classified as gifts and should be declined, and where already accepted be returned to the sender.

- Prizes or Awards - Staff should seek advice from their line manager or the Directors if they are offered an award or prize in connection with their official duties under the name of Beacon Plus. The staff will normally be allowed to keep the prize or award if there is no risk of public criticism and the nature of the gift cannot be perceived as a payment in favour of desirable outcomes commercial or otherwise.
- Donations - Beacon Plus does not make contributions to political parties, to religious organisations or to charities which have political or religious foundations. Beacon Plus supports charitable giving and initiatives by its colleagues. Requests for organisational-level donations must be submitted in writing to the Directors and will be assessed based on alignment with Beacon Plus's values and budgetary constraints, however, it is only open to Beacon Plus to make charitable donations at an organisational level.
- Sponsorship for Attendance at Courses, Seminars & Conferences - The offering of financial assistance or sponsorship by another organisation to attend relevant courses, conferences or seminars must be brought to the attention of the Directors. Such sponsorship may be permitted however it may only be permitted on the understanding that its acceptance will not compromise in any way future purchasing decisions either directly or indirectly, nor shall it lead to any other conflict of interest between Beacon Plus and the organisation offering sponsorship. Invitations of a social kind for example sporting or cultural events should be declined, except where Beacon Plus has a set interest in the event and the College Principal or Directors have approved.

**Gifts and Hospitality Register**

It is everyone's responsibility to inform the Directors of any gifts or hospitality of a value of over £50 offered in connection with Beacon Plus related activity. Items purely for learner benefit above £50 should still be reported for entry into the Gifts and Hospitality Register.

The Gifts and Hospitality Register may be disclosed under the Freedom of Information Act and will be subject to regulatory audit reviews. As the law is constantly changing, this policy is subject to review and Beacon Plus reserves the right to amend this policy without prior notice.

Any potential conflict of interest relating to procurement, recruitment, contracting, commissioning or funding decisions must be declared in accordance with the Register of Interests procedure.

## Fraud

Fraud comprises both the use of deception to obtain an unjust or illegal financial advantage and/or intentional misrepresentations by one or more individuals amongst management, staff, learners, contractors and other third parties.

It may include (but is not limited to):

- falsification or alteration of accounting records or other documents
- misappropriation of assets or theft
- suppression or omission of the effects of transactions from records or documents
- plagiarism
- recording of transactions without substance
- intentional misapplication of accounting policies
- wilful misrepresentations of transactions

Cyber fraud, including phishing, email spoofing, and unauthorised access to financial systems, is also considered a serious threat and is covered under this policy.

## Measures to Minimise the Risk of Fraud

In order to maintain Beacon Plus's high standards, procedures and controls have been established to provide an environment which will minimise the opportunity for fraud. The procedures and controls help Beacon Plus conduct its operations in a manner beyond reproach. They establish the rules to which the leadership team, staff and learners must adhere.

It is the responsibility of the leadership team to ensure that internal systems are operated to ensure that high standards are applied and brought to the attention of their staff. Procedures are operated throughout Beacon Plus to ensure:

- an adequate separation of duties (more than one employee is involved in key tasks)
- proper authorisation procedures (transactions must be approved)
- independent monitoring and checking of data and documentation (checks and balances).

Because of the above, leaders are responsible for:

- identifying the risks to which systems and procedures are exposed
- developing and maintaining effective controls to prevent and detect fraud
- ensuring that controls are being complied with by all staff.
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Individual members of staff have a responsibility to act with propriety in the use of

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organisation resources and in the handling and use of public funds and resources.

**Procedures for the Prevention of Fraud**

Beacon Plus utilises the following procedures to minimise its exposure to incidents of fraud:

- maintains appropriate Financial Regulations and Procedures
- ensures all staff are aware of their responsibilities under the Financial Regulations and Procedures and staff code of conduct
- recruits' staff in accordance with the approved staff recruitment policy and ensure that all staff receive adequate training to fulfil their job requirements to a high standard
- draws attention to the responsibility of staff under the Financial Regulations and other related procedures during the staff induction process;
- maintains and updates, on a regular basis, a Register of Interests for all staff
- ensures that the internal audit function reviews financial and other systems on a risk based cyclical basis and that systems categorised as high risk are reviewed on an annual basis
- ensures that both internal and external audit have access to all financial and other relevant documentation and appropriate reporting rights to the highest level of the Corporation;
- reviews internal and external auditors' reports through meetings of the Senior Management Team, Audit Committees, Committees and appropriate meetings of the full Corporation
- established procedures as set out below for the reporting and investigation of fraud and other irregularities.

**Procedures when fraud or bribery is suspected**

All persons who have an interest in Beacon Plus (staff, learners, consultants, contractors, suppliers, members of the public etc) are encouraged to raise concerns about any suspicion or actual malpractice at the earliest possible stage to the Directors. If there is any uncertainty as to what constitutes bribery or fraud, advice should be sought from the Directors. Malpractice may also be reported following the procedures set out in Beacon Plus's Whistleblowing Policy.

Where concerns relate to the conduct of a director or where an individual feels unable to report concerns through normal management channels, concerns may be reported directly to the Chair of Governors.
Should preliminary investigations by the College Principal or College Business Manager suggest the suspicion is reasonable, the Directors should be informed, without delay who will agree the appropriate course of action including any steps to be taken under the disciplinary procedures and whether a formal investigation by an external body is required.

If the suspicions stem from an audit, the College Business Manager will inform the Directors. Where further investigations indicate an offence may have occurred, the

Directors will consult with the Board of Directors. This will normally result in a decision to handle the matter according to Beacon Plus's Disciplinary Procedures and to involve the Police.

Where financial impropriety is suspected, the Police will normally be informed. Directors may commission a special investigation by an Internal Audit Service or others.

All reports will be treated in confidence and will be thoroughly investigated. At the time of reporting any actual or suspected malpractice, the person submitting the report will be assured that they will not be penalised for taking such action. If anonymity is requested, every effort will be made to ensure such confidentiality.

The person to whom the concerns are expressed will take prompt action and the person making the report will be notified of any action taken as soon as possible after the report is submitted. Where action is not considered appropriate, a timely and thorough explanation of the reasons for this will be given. In the event of a disagreement, the person making the report will be advised how to pursue the matter formally. All persons should be aware that if a suspicion is reported and results in a prosecution or disciplinary hearing, their involvement as a witness in those processes may be necessary, unless other substantial reliable evidence is available.

There is also a need to ensure that the investigative process is not misused. Therefore, any abuse, such as raising unfounded or malicious allegations, may be dealt with as a disciplinary matter in itself if the matter is raised by a member of staff or learner. This should not deter persons from raising genuine concerns (even if subsequently unfounded but made with good intent) as, in so doing, they will be supported in every possible way.

**Related policies and procedures**

- Assessment and Examinations policy
- Data Protection
- Due Diligence procedure
- Staff code of conduct
- Whistleblowing policy

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Update Schedule

| Version | | Reviewed | Reason for Update | Next review date |
|---|---|---|---|---|
| 1 | | Sep 2019 | New | Sep 2021 |
| 2 | | Nov 2021 | Amended | Sep 2023 |

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| 3 | | Nov 2023 | Reviewed | Sep 2024 |
| 4 | | Sep 2024 | Reviewed | Sep 2025 |
| 5 | | Sep 2025 | Reviewed | Sep 2026 |
| 6 | | Sep 2026 | Reviewed | Sep 2027 |

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