



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
<p>GBS Data Protection Policy</p> <p>GBS Whistleblowing Policy</p> <p>GBS Staff Complaints Policy and Procedure</p> <p>GBS Student Complaints Policy and Procedure</p> <p>GBS Student Referral Policy</p> <p>GBS Equality and Diversity Policy</p> <p>GBS Student Protection Plan</p> <p>GBS Anti-Harassment and Anti-Bullying Policy</p>
External Reference

1. Bribery Act Guidance published by the Ministry of Justice (<http://www.justice.gov.uk/downloads/legislation/bribery-act-2010-guidance.pc0818r>)

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)



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

