

# Anti-Bribery and Corruption Policy

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# 1. Introduction

- 1.1 The International College of Musical Theatre (the ICMT) is committed to conducting its business honestly and ethically. The ICMT has zero-tolerance towards bribery and corrupt activities and commits to acting professionally and fairly in all its business dealings.
- 1.2 The ICMT will continue to uphold its legal responsibilities and obligations in relation to the Bribery Act 2010.
- 1.3 The ICMT recognises that bribery and corruption are punishable by up to ten years of imprisonment and a fine. If our company is discovered to have taken part in corrupt activities, we may be subjected to an unlimited fine, be excluded from tendering for public contracts, and face serious damage to our reputation. With this in mind, we commit to preventing bribery and corruption in our business and take our legal responsibilities seriously.

## 2. Purpose

- 2.1 The purpose of this Policy is to:
  - Outline the responsibilities of the ICMT and its staff to uphold its stance on bribery.
  - Provide information and guidance for staff on recognising and dealing with bribery issues.

## 3. Who does this Policy apply to?

- 3.1 This Policy applies to all staff of the ICMT, including freelance teachers. It applies to any of our subsidiaries and their employees' behaviour in and outside the UK.

## 4. What is bribery?

- 4.1 Bribery refers to the offering, giving, promising, asking, agreeing, receiving, accepting, or soliciting something of value or advantage to induce or influence an action or decision.

- 4.2 A bribe refers to any inducement, reward, or object/item of value offered to another individual to gain commercial, contractual, regulatory, or personal advantage. Bribery is not limited to the act of offering a bribe. If an individual is on the receiving end of a bribe and accepts it, they are also breaking the law.
- 4.3 The ICMT Staff must not accept bribes to any degree. If they are uncertain about whether something is a bribe or a gift, or an act of hospitality, they must seek further advice from the ICMT management.

## 5. What is and what is not acceptable?

### 5.1 Gifts and hospitality

- a) The ICMT recognises that the practice of giving and receiving business gifts varies between countries, regions, cultures, and religions, so definitions of what is acceptable and not acceptable will inevitably differ for each. The intention behind all gifts should always be considered. All gifts, either given or received, should be disclosed and recorded as good practice.
- b) The giving or receiving of gifts is acceptable if it meets the following requirements:
- It is not made to influence the party to whom it is being given, obtain or reward the retention of a business or a business advantage, or as an explicit or implicit exchange for favours or benefits.
  - It is not made with the suggestion that a return favour is expected.
  - It complies with local law.
  - It is given in the name of the College, not in an individual's name.
  - It does not include cash or a cash equivalent (e.g. a voucher or gift certificate).
  - It is appropriate for the circumstances (e.g. giving small gifts around Christmas or as a small thank you to a company for helping with a large project upon completion).
  - It is of an appropriate type and value and given at an appropriate time, considering the reason for the gift.
  - It is given/received openly, not secretly.
  - It is not selectively given to a key or influential person to directly influence them.

- It is not offered to, or accepted from, a government official or representative or politician or political party without the prior approval of the ICMT senior management.
- c) It is not acceptable for you, or someone on your behalf to:
- Give, promise to give, or offer, a payment, gift or hospitality with the expectation or hope that either a personal or business advantage will be received, or to reward either a personal or business advantage already given.
  - Give, promise to give, or offer payment, gift or hospitality to a government official, agent, or representative to "facilitate" or expedite a routine procedure.
  - Accept a gift, hospitality or payment from a third party that you know or suspect is offered with the expectation that it will obtain either a personal or business advantage for them or by the ICMT in return.
  - Turn a blind eye to any of the above.
  - Threaten or retaliate against another colleague who has refused to commit a bribery offence or raised concerns under this Policy.
  - Engage in any activity that might lead to a breach of this Policy.
- d) This Policy does not prohibit normal and appropriate hospitality (given and received) to or from third parties to establish or maintain good business relationships or improve or maintain our reputation or image.

## 5.2 Facilitation payments and kickbacks

- a) The ICMT does not accept and will not make any form of facilitation payments of any kind. We recognise that facilitation payments are a form of bribery that involves expediting or facilitating the performance of a public official for a routine governmental action. We recognise that they tend to be made by low-level officials to secure or speed up the performance of a certain duty or action.
- b) The ICMT does not allow kickbacks to be made or accepted. We recognise that kickbacks are typically made in exchange for a business favour or advantage.
- c) Any member of staff that is asked to make a payment on behalf of the ICMT should always be mindful of what the payment is for and whether the amount requested is

proportionate to the goods or services provided. Staff should always ask for a receipt that details the payment's reason. If you have any suspicions, concerns or queries regarding a payment, you should raise these with the ICMT Operations Manager.

- d) All staff must avoid any activity that might lead to or suggests that a facilitation payment or kickback be made or accepted by the ICMT.

## 6. Donations

- 6.1 The ICMT accepts (and encourages) the act of donating to charities – whether through services, knowledge, time or direct financial contributions (cash or otherwise) – and agrees to disclose all charitable contributions it makes.
- 6.2 Employees must be careful to ensure that charitable contributions are not used to facilitate and conceal acts of bribery.
- 6.3 The ICMT does not make any contributions to political parties.

## 7. Staff responsibilities

- 7.1 All staff must ensure that they read, understand, and comply with this Policy.
- 7.2 All staff are equally responsible for the prevention, detection, and reporting of bribery and other forms of corruption. Staff are required to avoid any activities that could lead to, or imply, a breach of this Anti-Bribery Policy.
- 7.3 If staff have reason to believe or suspect that an instance of bribery or corruption has occurred or will occur in the future that breaches this Policy, you must notify a senior management team member.
- 7.4 Any member of staff who breaches this Policy will face disciplinary action, which could result in dismissal for gross misconduct. The ICMT reserves the right to terminate our contractual relationship with employees if they breach this Policy.

## 8. How to raise a concern

- 8.1 If you suspect that there is an instance of bribery or corrupt activities, you are encouraged to raise your concerns as early as possible to the Operations Manager
- 8.2 If you are uncertain about whether a certain action or behaviour can be considered bribery or corruption, you should speak to the Operations Manager or the ICMT Principal.

## 9. What to do if you become involved in bribery or corruption?

- 9.1 You must inform the Operations Manager if anyone offers you a bribe if you are asked to make one if you suspect that you may be bribed or asked to make a bribe in the future.

## 10. Protection

- 10.1 If you refuse to accept or offer a bribe or you report a concern relating to potential act(s) of bribery or corruption, we understand that you may feel worried about potential repercussions. The ICMT will support anyone who raises concerns in good faith under this Policy, even if the investigation finds that they were mistaken.
- 10.2 The ICMT will ensure that no one suffers any detrimental treatment due to refusing to accept or offer a bribe or other corrupt activities or because they reported a concern relating to potential act(s) of bribery or corruption.

## 11. Training and communication

- 11.1 The ICMT will provide training on this Policy as part of the induction process for all new employees.
- 11.2 The ICMT's anti-bribery and corruption policy and zero-tolerance attitude will be communicated to all suppliers, contractors, business partners, and any third parties at the outset of business relations and as appropriate after that.

## 12. Record keeping

- 12.1 The ICMT will keep detailed and accurate financial records and have appropriate internal controls to act as evidence for all payments made. We will declare and keep a written record of the amount and reason for hospitality or gifts accepted and given and understand that gifts and acts of hospitality are subject to managerial review

## 13. Monitoring and review

- 13.1 The ICMT senior management team is responsible for this Policy's suitability, adequacy, and effectiveness. The Operations Manager is responsible for monitoring its use and effectiveness and dealing with any queries on its interpretation and concerns.
- 13.2 This Policy does not form part of an employee's contract of employment. We may amend it at any time to improve its effectiveness at combatting bribery and corruption.

## Document control

<b>Document Title</b>	Anti-Bribery and Corruption Policy
<b>Document Category</b>	General Policies
<b>Version</b>	1
<b>Status</b>	Approved
<b>Author</b>	Operations
<b>Date of current version</b>	February 2022
<b>Date of next review</b>	February 2023
<b>Document location</b>	ICMT website
<b>Communication plan</b>	Available on the ICMT website.