



## **Anti-Corruption & Bribery Policy**

## **Polisi Gwrth-lygru a Gwrth-lwgrwobrwyo**

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If you or someone you know would like this document in Welsh or an alternative format please contact the HR Unit at [hr@nptcgroup.ac.uk](mailto:hr@nptcgroup.ac.uk) or on 01639 648308.

## Section 1: Context

- 1.1 It is the College's policy to conduct all of its business in an honest and ethical manner. The College takes a zero-tolerance approach to bribery, corruption and fraud and is committed to acting professionally, fairly and with integrity in all its business dealings and relationships wherever the College operates and implementing and enforcing effective systems to counter bribery, corruption and fraud.
- 1.2 The College will uphold all laws relevant to countering bribery, corruption and fraud in all the jurisdictions in which the College operates. However, the College remains bound by UK laws, including the Bribery Act 2010, in respect of its conduct both at home and abroad.
- 1.3 The purpose of this policy is:
  - 1.3.1 To set out the responsibilities of the College, and of those working for it, in observing and upholding its position on bribery and corruption.
  - 1.3.2 To provide information and guidance to those working for the College on how to recognise and deal with bribery and corruption issues.
- 1.4 If any member of staff requires assistance with understanding or implementing this policy, particularly where the reasons for this are related to disability, religion or belief, sex, gender reassignment, sexual orientation, pregnancy or maternity, marriage or civil partnership, age or race they should contact the HR Unit in the first instance for advice.

## Section 2: Status

- 2.1 The policy and procedures were considered and approved by the Senior Management Team (SMT) of the NPTC Group of colleges on [ ]. It was approved by the Joint Information and Consultative Committee (JICC) at a meeting held on [ ].
- 2.2 The policy and procedures have been reviewed by the Vice Principal: Corporate Services in conjunction with the Vice Principal: Financial Services and the Governance Officer and was approved by SMT on [ ] and JICC at a meeting held on [ ].
- 2.3 The policy has undergone Equality and Linguistic Impact Assessment, a copy of which is attached as Appendix II.

## Section 3: Policy Statement

### 3.1 Policy Statement

- 3.1.1 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 the College fails to prevent bribery the College can face an unlimited fine, exclusion from tendering for public contracts, and damage to its reputation. The College therefore takes its legal responsibilities very seriously.
- 3.1.2 This policy does not form part of any employee's contract of employment and it may be amended at any time.

### 3.2 Scope

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

### 3.3 General Principles

- 3.3.1 **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.
- 3.3.2 An **advantage** includes money, gifts, loans, fees, hospitality, services, discounts, the award of a contract or anything else of value.
- 3.3.3 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.
- 3.3.4 **Corruption** is the abuse of entrusted power or position for private gain.
- 3.3.5 Examples
- 3.3.5.1 **Offering a bribe** – An employee offers a potential client tickets to a major sporting event, but only if they agree to do business with the College. This would be an offence as the employee making the offer to gain a commercial and contractual advantage. The College may also be found to have committed an offence because the offer has been made to

obtain business for it. It may also be an offence for the potential client to accept the offer.

3.3.5.2 **Receiving a bribe** - A supplier gives an employee's nephew a job, but makes it clear that in return they expect the employee to use his / her 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 employee to accept the offer as the College would be doing so to gain a business / commercial advantage.

3.3.5.3 **Bribing a foreign official** – An employee arranges for the business to pay an additional "facilitation" payment to a foreign official to speed up an administrative process, such as clearing goods through customs. 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. The College may also be found to have committed an offence.

### 3.4 **Accountability and Responsibility**

3.4.1 The Board of Governors has overall responsibility for ensuring this policy complies with legal and ethical obligations. The Chief Executive Officer and Senior Management Team have overall responsibility to ensure that all those under their control comply with the policy.

3.4.2 The compliance manager (Vice Principal: Financial Services) has primary and day- to-day responsibility for implementing this policy, monitoring its use and effectiveness, dealing with any queries about it, and auditing internal control systems and procedures to ensure they are effective in countering bribery and corruption.

3.4.3 Management at all levels are responsible for ensuring those reporting to them understand and comply with this policy and are given adequate and regular training.

3.4.4 Staff are invited to comment on this policy and suggest ways in which it might be improved. Comments, suggestions and queries should be addressed to the compliance manager.

## **Section 4: Procedure**

4.1 If an employee or anyone working for the College is concerned that a fraudulent activity or an irregularity has occurred or is likely to occur (involving cash, stores, equipment, facilities, information, staff time, physical and / or intellectual property, non-disclosure of any personal financial or beneficial interest as required under the

College Register of Interests) they must refer their concerns in line with the procedure at Appendix I.

- 4.2 In this policy, **third party** means any individual or organisation the employee comes into contact with during the course of their interaction/work for the College, 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.

### **What You Must Not Do**

- 4.3 It is not acceptable for an employee (or someone on their 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 is known to be, or is suspected of being, offered with the expectation that the College 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 their manager OR the compliance manager;
  - (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.

### **Facilitation Payments and Kickbacks**

- 4.4 The College does not make, and will not accept, facilitation payments or "kickbacks" of any kind.
- 4.5 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.
- 4.6 Kickbacks are typically payments made in return for a business favour or advantage.
- 4.7 Employees must avoid any activity that might lead to a facilitation payment or

kickback being made or accepted by the College or on its behalf, or that might suggest that such a payment will be made or accepted. If an employee is asked to make a payment on the College's behalf, they should always be mindful of what the payment is for and whether the amount requested is proportionate to the goods or services provided. They should always ask for a receipt which details the reason for the payment. If they have any suspicions, concerns or queries regarding a payment, they should raise these with the compliance manager.

## **Gifts and Hospitality**

- 4.8 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 the College's image or reputation; or
  - (c) marketing or presenting the College's products and / or services effectively.
- 4.9 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 third 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 name of the Group, not in an individual's 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.
  - (g) it is in accordance with the conditions set out in the Employee Standards and Code of Conduct.
- 4.10 Promotional gifts of low value such as branded stationery to or from existing customers, suppliers and business partners will usually be acceptable.
- 4.11 Reimbursing a third party's expenses, or accepting an offer to reimburse the College's 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.
- 4.12 The College appreciates that practice varies between countries and regions and what may be normal and acceptable in one region may not be in another. 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.

## **Donations**

- 4.13 The College does not make contributions to political parties.
- 4.14 The College only makes charitable donations that are legal and ethical under local laws and practices. No donation must be offered or made without the prior approval of the compliance manager.

## **Record Keeping**

- 4.15 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.
- 4.16 Employees must declare and keep a written record of all hospitality or gifts given or received, which will be subject to managerial review.
- 4.17 Employees must submit all expenses claims relating to hospitality, gifts or payments to third parties in accordance with the College's expenses policy and record the reason for expenditure.
- 4.18 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.

## **Your Responsibilities**

- 4.19 Employees must ensure that they read, understand and comply with this policy.
- 4.20 The prevention, detection and reporting of bribery and other forms of corruption are the responsibility of all those working for the College or under its control. Employees are required to avoid any activity that might lead to, or suggest, a breach of this policy.
- 4.21 Employees must notify their line manager as soon as possible if they 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 them something to gain a business advantage with us, or indicates to them that a gift or payment is required to secure their business. Further "red flags" that may indicate bribery or corruption are set out in paragraphs 4.31 and 4.32.

## **How To Raise A Concern**

- 4.22 Employees are encouraged to raise concerns about any issue or suspicion of bribery, corruption or fraud at the earliest possible stage.
- 4.23 If anyone is offered a bribe, or are asked to make one, or if they believe or suspect

that any bribery, corruption or other breach of this policy has occurred or may occur, they must notify their line manager or report it in accordance with the College's Whistleblowing Policy as soon as possible

- 4.24 If they are unsure about whether a particular act constitutes bribery or corruption, raise it with their line manager.

### **Protection**

- 4.25 Employees who refuse to accept or offer a bribe, or who raise concerns or report another's wrongdoing, are sometimes worried about possible repercussions. The College aims 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.
- 4.26 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 an employee, student or College user believes that they have suffered any such treatment, they should inform the compliance manager immediately. If the matter is not remedied, and they are an employee, they should raise it formally using the College Grievance Procedure, which can be found on SharePoint.

### **Training and Communication**

- 4.27 Training on this policy forms part of the induction process for all individuals who work for the College, and regular training will be provided as necessary.
- 4.28 The College's 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.

### **Breaches of this Policy**

- 4.29 Any employee who breaches this policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct.
- 4.30 The College may terminate its relationship with other individuals and organisations working on its behalf if they breach this policy.

### **Potential Risk Scenarios: "Red Flag"**

- 4.31 The following is a list of possible red flags that may arise during the course of all individuals working for the College 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.
- 4.32 If an individual encounters any of these red flags while working for the College, they must report them promptly using the procedure set out in the whistleblowing policy:

- (a) the individual becomes aware that a third party engages in, or has been accused of engaging in, improper business practices;
- (b) the individual learns that a third party has a reputation for paying bribes, or requiring that bribes are paid to them, or has a reputation for having a "special relationship" with foreign government officials;
- (c) a third party insists on receiving a commission or fee payment before committing to sign up to a contract with the College, or carrying out a government function or process for it;
- (d) 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;
- (e) a third party requests that payment is made to a country or geographic location different from where the third party resides or conducts business;
- (f) a third party requests an unexpected additional fee or commission to "facilitate" a service;
- (g) a third party demands lavish entertainment or gifts before commencing or continuing contractual negotiations or provision of services;
- (h) a third party requests that a payment is made to "overlook" potential legal violations;
- (i) a third party requests that you provide employment or some other advantage to a friend or relative;
- (j) the individual receives an invoice from a third party that appears to be non-standard or customised;
- (k) a third party insists on the use of side letters or refuses to put terms agreed in writing;
- (l) the individual notices that the College has been invoiced for a commission or fee payment that appears large given the service stated to have been provided;
- (m) 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 the College; or
- (n) the individual is offered an unusually generous gift or offered lavish hospitality by a third party.

## **Section 5: Monitoring**

- 5.1 The Policy and Procedure are to be monitored by the Vice Principal: Financial Services and the Vice Principal: Corporate Services.

## **Section 6: Review**

- 6.1 The Policy and Procedure are to be reviewed by the Vice Principal: Financial Services and the Vice Principal: Corporate Services.
- 6.2 The policy will be reviewed biennially.
- 6.3 The next date for review is July 2021.

## Anti-Corruption Procedures

### Fraud Response Plan (Incidences of Fraud only)

#### Purpose

The purpose of this Fraud Response Plan is to define authority levels, responsibilities for action and reporting lines in the event of suspected fraud, corruption or irregularity. Those investigating a suspected fraud should:

- Aim to prevent further loss.
- Notify the police and Welsh Government, where necessary
- Not interfere or hamper any police investigations
- Establish and secure evidence necessary for disciplinary action
- Endeavour to recover any losses.
- Take appropriate action against those responsible.
- Review the reasons for the incident, the measures taken to prevent a recurrence, and any action needed to strengthen future responses to fraud.
- Keep all personnel with a need to know suitably informed about the incident and the College's response.

#### Initiating Action

Any member of the College who has reason to believe that a fraudulent, or any other irregularity has taken, or is about to take, place should report it as soon as possible to the NPTC CEO. No investigation shall commence without the authority of the NPTC Group CEO.

The NPTC Group CEO should, as soon as possible (and with the aim of acting within two working days), instruct one of the Vice Principals to undertake a preliminary investigation into the alleged/potential fraud; where necessary in line with the College Disciplinary Procedures.

If the actual or suspected incident concerns or implicates a member of the Executive Management Team, it should be reported without delay to the Governance Officer to inform the Chair of the Corporation Board and Chair of the Audit Committee. The Chair of the Corporation Board may select alternate officers of the College, or the College's Internal Auditors to implement the Fraud Response Plan where he or she feels it is appropriate. For instance, if the incident concerns or implicates the NPTC Group CEO, the NPTC Group Deputy CEO, will be responsible for initiate this Fraud Response Plan.

## **Preliminary Investigation**

The preliminary investigation is undertaken by the nominated Vice Principal (or alternative officer where appropriate) to determine the validity of the allegation to the extent that it warrants detailed investigation and also to determine the estimated scope or impact of the potential fraud.

The investigator will need to decide how to approach the investigation. He or she may decide not to interview the person (or people) who have been accused of the alleged fraud, so as not to impede any future potential police or College disciplinary investigation.

When the preliminary investigation is complete, the investigator will meet with the other Vice Principal and the Assistant Principal: HR to make an assessment on the appropriateness of referring the matter to the police.

If police involvement is required, the preliminary investigator will be responsible for establishing and maintaining contact with the police and will liaise with the Vice Principal and the Assistant Principal: HR prior to making any contact with the police on fraud related matters.

Whether or not police involvement is required, the Vice Principal and the Assistant Principal: HR will decide upon an officer of the College to be appointed to undertake a detailed investigation of the allegations. This officer should be one of the Senior Management Team or if specialist financial knowledge is required, the Finance Manager may conduct the detailed investigation. If deemed necessary, the Vice Principal and the Assistant Principal: HR may also request that the College's Internal Auditors undertake the investigation. Any investigation must be in line with the College Disciplinary Procedures.

If police involvement is required, the Group will decide whether the start and / or part of the investigation should be delayed to prevent impeding any police investigation.

## **Prevention of Further Loss**

Where the preliminary or detailed investigation provides reasonable grounds for suspecting a member or members of staff or others of fraud, the investigator, in conjunction with the Assistant Principal: HR will decide how to prevent further loss. This may require the suspension of the suspect or suspects, under the appropriate disciplinary procedure. It may be necessary to plan the timing of suspension to prevent suspects from destroying or removing evidence that may be needed to support disciplinary or criminal action.

In these circumstances, the suspect or suspects will be approached unannounced and will be supervised at all times before leaving the College's premises. They should be allowed to collect personal property under supervision, but should not be able to remove any property belonging to the College. Any security passes and keys to premises, offices and furniture will be returned. The Facilities & Estates Manager may be asked to advise on the best means of denying access to the College while suspects remain suspended, for example by changing locks, deactivating swipe cards and informing security staff not to admit the individuals to any

part of the premises. Similarly, a member of the Computer Services department may be instructed to withdraw without delay access permissions to the College's networks and computer systems.

The investigator will consider whether it is necessary to investigate systems other than that which has given rise to suspicion, through which the suspect may have had opportunities to misappropriate the College's assets.

The investigator may also recommend that the College's Internal Auditors be directed to undertake an audit of the systems/processes that have been involved in the alleged fraud

### **Detailed Investigation**

The appointed investigator, when they are advised that they can commence the investigation will undertake the investigation in accordance with the College's Staff Disciplinary Policy.

Where necessary, the investigator will liaise with the Assistant Principal: HR on matters that may concern or influence any disciplinary proceedings.

To ensure that disciplinary and/or criminal proceedings may be pursued, the investigator will ensure that all evidence gathered during the investigation is available to be passed on to the police, if so required.

On conclusion of the fraud investigation an investigation report will be provided to the NPTC Group CEO, the Audit Committee and where necessary any relevant managers.

This report will include (where appropriate):

- A description of the incident, including the value of any loss, the people involved, and the means of perpetrating the fraud.
- Measures proposed to reduce the likelihood of a recurrence with a follow-up report on whether the actions have been taken.
- Any action needed to strengthen future responses to fraud.
- Progress with disciplinary action.
- Progress with criminal action.

### **Recovery of Losses**

Recovering losses is a major objective of any fraud investigation. The Vice Principal: Financial Services will ensure that in all fraud investigations the amount of any loss is

quantified. Repayment of losses will be sought in all cases.

Where the loss is substantial the Vice Principal: Financial Services will obtain legal advice regarding the need to freeze the suspect's assets through the courts, pending conclusion of the investigation. Legal advice may also be obtained about prospects for recovering losses through the civil court, where the perpetrator refuses repayment. The College will normally seek to recover its costs in addition to any losses as a result of the fraud.

### **External Reporting / Notification**

Any attempted, suspected or actual fraud or irregularity matching the criteria in the Audit Code of Practice will be reported without delay to Welsh Government (WG), the Chair of the Audit Committee and the Internal and External Audit Partners.

The WG requires notification of any attempted or actual fraud or irregularity.

The Vice Principal: Financial Services is responsible for informing WG of any reportable incidents.

The NPTC Group CEO in consultation with the Marketing department will be responsible for dealing with any enquiries from the press and other media.



## Equality and Linguistic Impact Assessment & Screening Document

This document is used to record the assessment of whether or not a policy, practice or provision - or a change to them - will have a negative or positive impact on the equality of a protected characteristic or on the use of the Welsh Language.

### Stage 1 – Initial Screening

Firstly consider what item is being assessed and what is its purpose?

Using the boxes below, provide a description of the policy, practice or provision being assessed with a short statement about what the item is intended to achieve (its aims and objectives) and who is affected, eg staff, students, parents/carers, partners, etc.

<p><b>Description of item:</b> Anti-corruption and Bribery Policy</p>
<p><b>Aims &amp; objectives:</b> To ensure the Group complies with UK laws regarding bribery, corruption and fraud.</p>
<p><b>Those affected – eg staff, students, parents, partners etc :</b> This policy applies to all persons working for the College or any Group Company or on the behalf in any capacity, including employees at all levels, directors, Corporation Board, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives and business partners, sponsors, or any other person associated with the College or any Group Company, wherever located.</p>

Considering the item being assessed, use the boxes below to record your initial thoughts on the possible consequences for the nine protected characteristics and the use of the Welsh Language.

Protected Characteristic	Potential impact <b>positive or negative</b>
<p><b>Sex</b> Also called gender, means a man or a woman</p>	None identified
<p><b>Race</b> Refers to the protected characteristic of Race. It refers to a group of people defined by their race, colour, and nationality (including citizenship) ethnic or national origins</p>	None identified

Protected Characteristic	Potential impact <b>positive or negative</b>
<p><b>Age</b> Where this is referred to, it refers to a person belonging to a particular age (e.g. 32 year olds) or range of ages</p>	None identified
<p><b>Gender Re-assignment</b> The process of transitioning from one gender to another</p>	None identified
<p><b>Sexual Orientation</b> Whether a person's sexual attraction is towards their own sex, the opposite sex or to both sexes</p>	None identified
<p><b>Religion &amp; Belief</b> Religion has the meaning usually given to it but belief includes religious and philosophical beliefs including lack of belief (e.g. Atheism). Generally, a belief should affect your life choices or the way you live for it to be included in the definition.</p>	None identified
<p><b>Pregnancy &amp; Maternity</b> Pregnancy is when expecting a baby, Maternity refers to period after the birth</p>	None identified
<p><b>Marriage &amp; Civil Partnership</b> Marriage - between same or opposite sex couples, Civil Partnership - between same sex couples</p>	None identified
<p><b>Disability</b> Any long term condition that affects day to day activity. Conditions include hearing, visually &amp; physical impairment, learning disability, mental health, cancer, HIV &amp; MS</p>	None identified

Welsh Language	Potential impact <b>positive or negative</b>
The Welsh Language (Wales) Measure 2011 establishes equal rights for Welsh speakers, based on the principles In Wales, the Welsh language should be treated no less favourably than the English language & persons in Wales should be able to live their lives through the medium of Welsh if they choose	None identified
<b>Explanation – if appropriate</b>	
<b>Priority Level: high / medium / low</b> High	

### Stage 2 – Analysis

Based on the screening process above you will need to carry out analysis to verify your initial decision. Below you need to show what equality and linguistic analysis has been done on this item? List the evidence, data or sources used to analyse the impact of this item. (include any, data, reports, surveys or web links utilised in the process)

Protected Characteristics	Data Source & Findings
<b>Sex</b>	Practical application of the Policy in its previous format and its impact on the protected characteristics and the Welsh language.
<b>Race</b>	
<b>Disability</b>	
<b>Sexual Orientation</b>	
<b>Age</b>	

<b>Pregnancy &amp; Maternity</b>	
<b>Marriage &amp; Civil Partnership</b>	
<b>Religion &amp; Belief</b>	
<b>Gender Re-assignment</b>	
<b>The Use of the Welsh Language</b>	<b>Data Source &amp; Findings</b>
<b>Welsh</b>	

### Stage 3 – Engagement / Consultation & Assessment

Following your analysis, you now need to record how you have assessed the item and who was engaged in the process. How was an assessment of the equality and linguistic impact reached, who was involved in the decision?

<b>Group impacted</b>	<b>Nature of positive and/or negative impact or explanation for no identified impact</b>
<b>Sex</b>	Discussions with the HR team and managers responsible.
<b>Race</b>	Discussions with the HR team and managers responsible.
<b>Disability</b>	Discussions with the HR team and managers responsible.
<b>Sexual Orientation</b>	Discussions with the HR team and managers responsible.
<b>Age</b>	Discussions with the HR team and managers responsible.
<b>Pregnancy &amp; Maternity</b>	Discussions with the HR team and managers responsible.
<b>Marriage &amp; Civil Partnership</b>	Discussions with the HR team and managers responsible.
<b>Religion &amp; Belief</b>	Discussions with the HR team and managers responsible.
<b>Gender Re-assignment</b>	Discussions with the HR team and managers responsible.

<b>Welsh</b>	Discussions with the HR team and managers responsible.
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### Stage 4 – Mitigation & Changes

Finally, detail what changes have been made or are scheduled for change following the assessment & engagement to reduce or eliminate any adverse impact?

<b>Impact</b>	<b>Possible change</b>	<b>Recommended &amp; actioned</b>
Readability issues	Formatted in line with publication guidelines	completed
Accessibility	Improved contact details and methods of contact	Completed

**Statement of justification and mitigation where negative impact cannot be avoided**

N/A

**Record of Evidence**

**1. Consultation**

What consultation has taken place? (state when and who with)

Consultation process	Findings

**2. Publication**

When will the E&LIA be published?

**Date and method:**

**As an appendix to the policy.**

**3. Monitor & Review**

How will this item be reviewed & monitored

**Lead person or group responsible and review dates :**

**Vice Principal: Corporate Services**

### Checklist

- Has the alternative format statement been included at the start of the policy document? If you or someone you know would like this document in an alternative format please contact the HR Unit at [hr@nptc.ac.uk](mailto:hr@nptc.ac.uk) or on 01639 648308.
- Has the document been formatted in line with NPTC Group publication guidelines and policy template?
- Has the Equality & Diversity paragraph been included at the end of section 1 for all policies?  
If any member of staff requires assistance with understanding or implementing this policy, particularly where the reasons for this are related to disability, religion or belief, sex, gender reassignment, sexual orientation, pregnancy or maternity, age or race they should contact the Senior Officer: Diversity Officer, in the first instance for advice.
- When you have completed the paperwork please ensure it is added as an appendix to the relevant policy or procedure
- Any questions? please contact the HR Unit on 01639 648308 or by email [hr@nptcgroup.ac.uk](mailto:hr@nptcgroup.ac.uk)

### Signature of Assessment Manager & other staff completing ELIA

Name (s) – please print

Catherine Lewis  
Vice Principal: Corporate Services

Lesley Blower  
Senior Officer: Diversity

Signature (s)

Date 10.08.16