

<b>Policy Name</b>	Anti-Bribery and Corruption	
<b>Policy Reference</b>	NWCS-OP01	
<b>Policy Owner</b>	Paul Sheron	
<b>Latest Review Date</b>	31/01/2023	
<b>Next Review Date</b>	31/01/2024	
<b>Version</b>	<b>Approved by</b>	<b>Summary of changes</b>
1	PS	

<p><b>Aim and Purpose of the policy</b></p>	<p>To ensure that 100% of staff are fully aware and understand that a bribe is an inducement or reward offered, promised or provided in order to gain any commercial, contractual, regulatory or personal advantage.</p>
<p><b>Who is this policy for?</b></p>	<p>This policy relates to all aspects of NWCS activity</p>
<p><b>Key contacts and resources</b></p>	<p><u>Resources</u> -Keeping Children Safe in Education (DfE September 2022) -Equality &amp; Diversity Policies</p> <p><u>Key Contacts</u> Head of Centre- Paul Sheron Operational Manager- Karen Luxon</p>
<p><b>Relate Policies and Procedures</b></p>	

## **Aim and Vision**

At NWCS Training Ltd, we are committed to doing the right thing in the right way and we take our legal responsibilities very seriously. The purpose of this policy is to establish controls to ensure compliance with all applicable anti-bribery and corruption regulations, and to ensure that the company's business is conducted in a socially responsible manner.

## **Rationale**

It is our policy to conduct all of our business in an honest and ethical manner. We take a zero-tolerance approach to bribery and corruption. We 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. We will uphold all laws relevant to countering bribery and corruption in all the jurisdictions in which we operate.

## **Intent**

This policy applies to all individuals working at all levels and grades, whether permanent, fixed-term or temporary.

This policy covers:

- Bribes;
- Gifts and hospitality;
- Facilitation payments;
- Political contributions;
- Charitable contributions.

## **Implementation**

### **Bribery**

- A bribe is an inducement or reward offered, promised or provided in order to gain any commercial, contractual, regulatory or personal advantage.
- It is not acceptable for staff (or someone on their behalf:
- To 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;
- Accept payment from a third party that you know or suspect is offered with the expectation that it will obtain a business advantage for them or a business advantage will be provided by NWCS Training in return;
- Accept a gift or hospitality from a third party if you know or suspect that it is offered or provided with an expectation of a business advantage;
- Threaten or retaliate against another worker who has refused to commit a bribery offence or who has raised concerns under this policy; or
- Engage in any activity that might lead to a breach of this policy.

Employees must not engage in any form of bribery, either directly or through any third party.

### **Gifts and hospitality**

Employees must not offer or give any gift or hospitality:

- Which could be regarded as illegal or improper and violates the recipient's policies;
- To any public employee or government officials or representatives, or politicians or political parties;
- Unless approved in writing by the company;
- If there is any suggestion that a return favour will be expected or implied.

If it is not appropriate to decline the offer of a gift, the gift may be accepted, provided it is then declared to the company and donated to charity. In this instance, the test to be applied is whether in all the circumstances the gift or hospitality is reasonable and justifiable. The intention behind the gift should always be considered. Where this policy requires written approval to be given, the Senior Leadership Team shall put in place a process to maintain a register of all such approvals.

### **Political contributions**

NWCS Training Ltd do not make donations, whether in cash or kind, in support of any political parties or candidates, as this can be perceived as an attempt to gain an improper business advantage.

### **Charitable contributions**

Charitable support and donations are acceptable and are encouraged. However, employees must be careful to ensure that charitable contributions are not used as a scheme to conceal bribery. We only make charitable donations that are legal and ethical. No donation must be offered or made without the prior approval of the compliance manager. All charitable contributions should be publicly disclosed.

### **Your responsibilities**

You must ensure that you read, understand and comply with this policy. The prevention, detection and reporting of bribery and other forms of corruption are the responsibility of all those working for the company, or under its control. All employees are required to avoid any activity that might lead to, or suggest, a breach of this policy.

You must notify the manager as soon as possible if you believe or suspect that a conflict with or breach of this policy has occurred, or may occur in the future. Any employee who breaches this policy will face disciplinary action, which could result in dismissal for gross misconduct. We reserve our right to terminate our contractual relationship with other workers if they breach this policy.

### **Record-keeping**

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

Staff members must declare and keep a written record of all hospitality or gifts accepted or offered, which will be subject to managerial review.

You must ensure all expenses claims relating to hospitality, gifts or expenses incurred to third parties are submitted in accordance with our expenses policy and specifically record the reason for the expenditure.

All accounts, invoices, memoranda and other documents and records relating to dealings with third parties, such as clients, suppliers and business contacts, should be prepared and maintained with strict accuracy and completeness. No accounts must be kept 'off-book' to facilitate or conceal improper payments.

### **How to raise a concern**

Staff are encouraged to raise concerns about any issue or suspicion of malpractice at the earliest possible stage. If you are unsure whether an act constitutes bribery or corruption, or if you have any other queries or concerns, these should be raised with your Manager.

### **What to do if you are a victim of bribery or corruption**

It is important that you advise the company as soon as possible if you are offered a bribe by a third party, are asked to make one, suspect that this may happen in the future, or believe that you are a victim of another form of unlawful activity.

### **Protection**

Employees who refuse to accept or offer a bribe, or those 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.

We are 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 compliance manager immediately.

### **Training and communication**

Training on this policy forms part of the induction process for all new employees. All existing employees will receive regular, relevant training on how to implement and adhere to this policy. In addition, all employees will be asked to formally accept conformance to this policy on an annual basis.

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.

### **Dissemination and Implementation**

This Bribery and Corruption policy will be introduced to each staff member at induction and made available electronically.

### **Impact**

It is a requirement that 100% of staff adhere to this policy in full throughout their time in employment.

### **Definitions**

'NWCS Training Ltd staff' refers to any individual that is employed by NWCS Training Ltd.

### **Key Facts**

Professionals providing this service should be aware of the following:

- Members of staff should ensure that they comply with the Anti-Bribery and Corruption Policy
- The Anti-Bribery and Corruption Policy is non-contractual and may be amended at any time.
- Any failure to comply with this policy can result in disciplinary action against the member of staff.

**Policy Review and Implementation**

This policy will be updated as necessary to reflect current best practice, official guidance, and in line with current legislation.

This policy is specific to that of NWCS Training Ltd and has been ratified by Head of Centre Paul Sheron

A handwritten signature in black ink, appearing to be 'Paul Sheron', written in a cursive style.

31/01/2023