

Anit Bribery and Corruption Policy (EPA)

SMART AWARDS
BEECHWOOD HOUSE, TANNERS LANE, BERSKWELL, COVENTRY CV7 7DA

Anti Bribery and Corruption Policy



Doc ref EPA 018-3.0
Date of issue 01/07/2017
Review date 01/12/2021

1. Policy Statement

The purpose of this policy is to establish controls to ensure compliance with all applicable anti-bribery and corruption regulations, and to ensure that Smart Awards business in relation to end-point assessments is conducted in a socially responsible manner. 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 will uphold all laws relevant to countering bribery and corruption in all the jurisdictions in which we operate. However, we remain bound by the laws of the UK, including the Bribery Act, in respect of our conduct.

2. Scope

This policy applies to independent end-point assessors and Smart Awards staff that engage with employers, lead providers, and apprentices involved in EPA activities

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 independent end-point assessors if they breach this policy by accepting, bribe, gifts and/or hospitality

3. Responsibility

Smart Awards Chief Executive has overall responsibility for ensuring that this policy is implemented.

4. Policy and implementation

Bribes

Bribery is the offering, promising, giving, accepting or soliciting of an advantage as an inducement for action which is illegal or a breach of trust. A bribe is an inducement or reward offered, promised or provided in order to gain any commercial, contractual, regulatory or personal advantage. Employees must not engage in any form of bribery, either directly or through any third party.

Gifts and hospitality

We appreciate that the practice of giving business gifts 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 or hospitality is reasonable and justifiable.

- End point assessors and/ or employees must not offer or give any gift or hospitality unless approved by Smart Awards
- Employees may not accept any gift or hospitality unless approved by Smart Awards

How to raise a concern

You are encouraged to raise concerns about any issue or suspicion at the earliest possible stage. If you are unsure whether a particular act constitutes bribery or corruption, or if you have any other queries or concerns, these should be raised with Smart Awards.

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

It is important that you tell Smart Awards 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.

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5. Monitoring

Smart Awards will monitor the effectiveness and review the implementation of this policy, regularly considering its suitability, adequacy and effectiveness. Any improvements identified will be made as soon as possible. Internal control systems and procedures will be subject to regular audits to provide assurance that they are effective in countering bribery and corruption.