



Antibribery & Corruption Policy

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SCOPE

1. 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 and centres business is conducted in a socially responsible manner. This policy covers: Bribes; Gifts and hospitality; Facilitation payments; Political contributions and Charitable contributions.

OFQUAL GENERAL CONDITIONS

2. A4.5: An awarding organisation must take all reasonable steps to avoid any part of the assessment of a Learner (including by way of Moderation) being undertaken by any person who has a personal interest in the result of the assessment.

SQA ACCREDITATION PRINCIPLES

3. Principle 10. The awarding body shall ensure that it has the necessary arrangements and resources for the effective delivery; assessment and quality assurance of SQA accredited qualifications.

RESPONSIBILITIES

4. This is policy is for qualifications offered by Smart Awards. This policy is for centres and learners accessing Smart Awards qualifications and related services and all those involved with the development, delivery and quality assurance of Smart Awards qualifications. Smart Awards has overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it. Smart Awards has the day-to-day responsibility for implementing this policy and for monitoring its use and effectiveness and dealing with any queries on its interpretation.

R	Responsibilities	The person who actually carries out the process or task. The person is responsible for action/implementation. Responsibilities can be shared											
A	Accountabilities	The person who is ultimately accountable for the process or task being completed and who has the authority to make decisions, yes or no authority and veto power. Responsible person (s) are accountable to this person. Only one A can be assigned to a task											
C	Consulted	The person to be consulted prior to a final decision or action (two-way communication). People who are not directly involved with carrying out the task but are consulted with.											
I	Informed	Anyone whose work depends on the process or task and who has to be updated about the progress after a decision or action has been taken (one-way communication).											
POLICIES		BOARD	CEO	MD	OPS DIRECTOR	QUALITY PORTFOLIO MANAGER	STANDARDS COMPLIANCE OFFICER	QUAL ADMIN OFFICER	IT CONSULT	FINANCE AUDITOR	EQA	NOPS BOARD	CENTRES
Awarding Policies and Process													
Antibribery and corruption		A	R	R	R	R	R	C	I	I	R	I	R
ASSOCIATED POLICIES													
Fraud													
Malpractice/maladministration													
Risk management													
Holiday/Sickness Cover													
The MD, CEO and Operations Director cover holiday/sickness and absenteeism for areas where the person is responsible for action/implementation of a task. The MD, CEO and Operations Director hold company wide experience to be able to carry out these tasks and hold no conflicts of interest.													

5. The prevention, detection and reporting of bribery and other forms of corruption are the responsibility of all those working for us or under our control. Centres and Smart Awards individuals are required to avoid any activity that might lead to, or suggest, a breach of this policy. You must notify the MD of Smart Awards 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.
6. Any person working on behalf of Smart Awards 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 others if they breach this policy. Centre who breach this policy are subject to sanctions or removal of centre approval status.

POLICY STATEMENT

7. 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.
8. 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.
9. Bribery and corruption are punishable for individuals by imprisonment and a fine. If we are found to have taken part in corruption, we could face an unlimited fine, be excluded from tendering for public contracts and face damage to our reputation. We therefore take our legal responsibilities very seriously.
10. 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. All who work for or on behalf of Smart Awards must not engage in any form of bribery, either directly or through any third party.
11. 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.
 - Employees must not offer or give any gift or hospitality which could be regarded as illegal or improper which exceeds £50.00 in value for each individual gift or hospitality
 - (Not to exceed a total value of £100 in any financial year), unless approved in writing by Smart Awards
 - Employees may not accept any gift or hospitality from our business partners if: it exceeds £50.00 in value for each individual gift or hospitality (not to exceed a total of £100 in any financial year), unless approved in writing by Smart Awards or 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 Smart Awards and donated to charity
 - The intention behind the gift should always be considered.

12. Charitable and Political Contributions: We do not make donations, whether in cash or kind, in support of any political parties or learners, as this can be perceived as an attempt to gain an improper business advantage. Charitable support and donations are acceptable (and indeed are encouraged), whether of in-kind services, knowledge, time, or direct financial contributions. 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 under local laws and practices. No donation must be offered or made without the prior approval of Smart Awards. All charitable contributions should be publicly disclosed.

PROCEDURE

13. How to raise a concern: You are encouraged to raise concerns about any issue or suspicion of malpractice 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.

14. 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.

15. Protection: Individuals 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.

16. 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.

17. If you believe that you have suffered any such treatment, you should inform Smart Awards. If the matter is not remedied, and you are an employee, you should raise it formally using the company's Grievance Procedure.

18. Our zero-tolerance approach to bribery and corruption is communicated to all centres, suppliers, contractors and business partners at the outset of our business relationship with them and as appropriate thereafter.

19. Monitoring and review: 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.

20. Record keeping: Smart Awards keeps financial records and has appropriate internal controls in place which will evidence the business reason for making payments to third parties. Employees must declare and keep a written record of all hospitality or gifts accepted or offered, which will be subject to managerial review. Employees 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.

REVIEW OF THIS POLICY

21. This policy is reviewed and revised annually in response to feedback, changes in legislation and guidance from the regulators, SQA Accreditation or Ofqual.

PROCESS FOR RAISING ISSUE

Process Step Description	Process	Person Responsibility	Organisation Responsibility
Notification Smart Awards of issue	Process	Centre Manager	Centre
Notification Smart Awards of issue	Process	Smart Awards Staff, Learner, EQA, Assessor, employer	Other stakeholders
Investigate issue	Process	MD	Smart Awards
Add to risk log on SAMS	Process	MD	Smart Awards
Board reviews risk	Decision	Board - holds responsibility and experience to make decisions and measured risks	Smart Awards
Mitigate risk	Decision	Board - holds responsibility and experience to make decisions and measured risks	Smart Awards
Action	Decision	Board - holds responsibility and experience to make decisions and apply suitable actions.	Smart Awards
Report to regulators if required	Process	MD	Smart Awards
Communicate outcome to centres or other stakeholders	Process	MD	Smart Awards
Lessons learned	Process	MD	Smart Awards
Keep under review on risk register	Process	Board	Smart Awards
Stop	End	MD	Smart Awards