



Antibribery and Corruption Policy

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POLICY STATEMENT

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 business in relation to end-point assessments is conducted in a socially responsible manner. It is our policy to conduct all our business in an honest and ethical manner. We take a zero-tolerance approach to bribery and corruption.
2. 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.

SCOPE

3. This policy applies to independent end-point assessors and Smart Awards staff that engage with employers, training providers, and apprentices involved in EPA activities
4. 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

OFQUAL GENERAL CONDITIONS

5. 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

6. 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

7. This is policy is for end point assessments offered by Smart Awards. This policy is for employers, training providers and apprentices accessing Smart Awards end point assessments and related services and all those involved with the development, delivery and quality assurance of Smart Awards end point assessments. 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	EMPLOYERS TRAINING PROVIDERS
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.													

8. 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. Employers, training providers 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.
9. 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. Employers and training providers who breach this policy are subject to sanctions or removal of lead training provider approval status.
10. Smart Awards MD has overall responsibility for ensuring that this policy is implemented.
 - 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

11. 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

12. 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

13. 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.

MONITORING

14. 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.

REVIEW OF THIS POLICY

15. 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	Employer and Training provider Manager	Employer & Lead Training provider
Notification Smart Awards of issue	Process	Smart Awards Staff, apprentices, 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 Employers & Training	Process	MD	Smart Awards

providers or other stakeholders			
Lessons learned	Process	MD	Smart Awards
Keep under review on risk register	Process	Board	Smart Awards
Stop	End	MD	Smart Awards

