

## ANTI-BRIBERY AND CORRUPTION POLICY

### INTRODUCTION

- 1 The Procurement Academy conducts its business in a legal and ethical manner. The Procurement Academy's Directors, employees, and any other associated person acting on the The Procurement Academy's behalf are responsible for acting honestly and with integrity by ensuring that their activities, interests, and behaviours do not conflict with these obligations, regardless of their seniority. These parties are referred to as 'staff' below.
- 2 This policy, based on the anti-bribery legislation (the Bribery Act 2010), requires that staff must not either directly or indirectly:
  - a) Offer, give, solicit, or accept any bribe, either in cash or any other form of inducement, to or from any person or company, wherever they are located and whether they are a public official or body, or private person or company.
  - b) Gain or retain any commercial, contractual, or regulatory advantage through unethical or illegal means when conducting business on behalf of The Procurement Academy.
- 3 Staff and associated persons must understand and strictly comply with the UK anti-bribery laws in all countries of the world.

### DEFINITIONS

- 4 **Bribery** is the offer, promise, giving, demanding, or accepting of an advantage as an inducement for an action which is illegal, unethical, a breach of trust or the improper performance of a contract. Inducement can take the form of gifts, hospitality, fees, rewards, jobs, internships, examination grades, favours, or other advantages. It does not matter whether the bribe is given or received directly or through a third party or whether it is for the benefit of the recipient or some other person.
- 5 **Corruption** is the misuse of entrusted power for personal gain.
- 6 An **associated person** provides services to the The Procurement Academy or acts on the The Procurement Academy's behalf and could be an employee of any type, consultants, agents and other forms of intermediaries and subsidiaries.

- 7 A **foreign or government official** could include a public official, whether foreign or domestic; a political candidate or party official; a representative of a government owned or majority-controlled organisation; or an employee of a public international organisation.
- 8 **Facilitation payments** are unofficial financial payments or other advantages (either directly or indirectly) made to secure or expedite the performance of a routine or necessary action to which the payer of the facilitation payment has legal or other entitlement. For further information on facilitation payments see the Facilitation Payments Guidance.

## PRINCIPLES

- 9 This policy applies to all The Procurement Academy's activities and operations and to all its dealings and negotiations with third parties in all countries in which its employees, agents, partners, and associates operate. All employees and individuals working on behalf of, under contract from or in collaboration with any part of The Procurement Academy or with its employees are required to comply with this policy.
- 10 The Procurement Academy has a zero-tolerance approach to bribery and corruption and as such, all forms of bribery and corruption are prohibited. A bribe does not actually have to take place – just promising to give or agreeing to receive a bribe is prohibited.
- 11 The Procurement Academy will address risks of bribery by ensuring adequate and proportionate measures are developed and implemented to mitigate them.
- 12 Arrangements with third parties will be subject to clear contractual terms, including specific provisions requiring them to comply with minimum standards and procedures relating to bribery and corruption. The Procurement Academy will not engage, or continue business with, any individual or third party who we know or reasonably suspect of engaging in bribery or corruption.
- 13 No staff member or associated person will suffer penalty or other adverse consequences for refusing to pay bribes even if a refusal may result in loss of business or a delay in proceedings.
- 14 The prevention, detection and reporting of bribery are the responsibility of all staff. They should raise any concerns or allegations of bribery or corrupt activity with a director.
- 15 The Procurement Academy will ensure it takes appropriate action in response to any reported incidents of bribery or corruption. Investigations of bribery or corrupt activity will follow the principles and procedures set out in the Anti-Fraud Policy.

Failure to comply with this Policy will lead to disciplinary action and proven allegations will lead to disciplinary action resulting in summary dismissal. In relevant cases the police and the Serious Fraud Office (SFO) will be informed as certain offences carry criminal liability for individuals concerned and sanctions include significant fines and/or imprisonment.

## PROPORTIONATE PROCEDURES

16 The Procurement Academy will ensure it has procedures in place to prevent bribery by staff and other persons associated with it, which are proportional to the bribery risks it faces and to the nature, scale, and complexity of the The Procurement Academy's activities.

## RISK ASSESSMENT

17 Unit managers or their nominee are responsible for ensuring risks are assessed and appropriate action taken to comply with this Policy.

## DUE DILIGENCE

18 The Procurement Academy will apply due diligence procedures, taking a proportionate and risk-based approach, in respect of persons and organisations that perform or will perform services for or on behalf of the The Procurement Academy to mitigate identified bribery risks.

## COMMUNICATION

20 The Procurement Academy ensures that its bribery prevention and associated policies and procedures are embedded and understood throughout the organisation through internal and external communication.

21 Unit managers or their nominee are responsible for ensuring the communication of The Procurement Academy's Anti-Bribery and Corruption Policy and other relevant policies to associated person(s). Unit managers will also monitor and review their procedures and action plans to ensure their suitability, adequacy, and effectiveness in relation to this Policy and implement improvements as appropriate.

DOCUMENT CONTROL				
VERSION	DATE OF ISSUE	DATE OF REVIEW	DATE OF NEXT REVIEW	SIGNATURE
3	April 2020	August 25	August 2026	<i>Philip Chippindale</i>