



Anti-Bribery & Corruption Policy

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1. Introduction

LICQual UK is committed to conducting its business with the highest standards of integrity and professionalism. This Anti-Bribery & Corruption Policy outlines the standards and procedures for preventing bribery and corruption within our organization and its operations, ensuring compliance with the UK Bribery Act 2010 and other relevant anti-corruption laws. Bribery and corruption have no place within LICQual UK, and we expect all our staff, Accredited Training Centres (ATCs), and stakeholders to uphold these standards.

2. Purpose of the Policy

The purpose of this policy is to:

- Prevent bribery and corruption in all forms, both direct and indirect.
- Establish clear procedures for identifying, reporting, and addressing any potential or actual incidents of bribery and corruption.
- Provide guidance on acceptable practices and behaviors in relation to gifts, hospitality, and business relationships.
- Ensure compliance with all applicable anti-bribery and anti-corruption laws.
- Protect the reputation and integrity of LICQual UK, its staff, ATCs, and stakeholders.

3. Scope and Applicability

This policy applies to:

- LICQual UK employees, contractors, and board members.
- Accredited Training Centres (ATCs) and their staff delivering LICQual UK qualifications.
- All stakeholders, including partners, suppliers, learners, and any third parties involved in LICQual UK activities.

4. Definition of Bribery and Corruption

- **Bribery:** Offering, promising, giving, accepting, or soliciting anything of value with the intention of influencing the actions of an individual or organization.
- **Corruption:** The abuse of power for personal gain, which includes bribery but also extends to other unethical practices, such as fraud, embezzlement, or kickbacks.

5. Prohibited Activities

LICQual UK strictly prohibits the following activities:

- **Offering or accepting bribes:** Any attempt to influence a decision or behavior through gifts, money, services, or other benefits.
- **Facilitation payments:** Small bribes offered to speed up routine administrative processes (e.g., customs clearance or issuing permits) are prohibited.
- **Conflict of interest:** Any situation where personal interests may conflict with professional duties and obligations.
- **Kickbacks:** Payments made to an individual or organization in exchange for business or contractual advantages.
- **Improper gifts and hospitality:** Accepting or offering gifts, entertainment, or hospitality that could be perceived as a bribe.

6. Gifts, Hospitality, and Entertainment

LICQual UK recognizes that gifts, hospitality, and entertainment are sometimes offered as a sign of goodwill or to foster business relationships. However, the following guidelines must be followed:

- **Gifts:** Employees and ATC staff must not accept gifts of significant value. Any gifts offered should be of a nominal value, and they must not influence, or appear to influence, any business decisions.
- **Hospitality:** Any hospitality offered or accepted must be reasonable, proportionate, and in line with standard business practices. Hospitality should not create a sense of obligation or expectation of favorable treatment.

- **Entertainment:** Any entertainment, including meals or events, must be appropriate for the occasion and not excessive. Employees should ensure that entertainment does not compromise their integrity or objectivity.

7. Responsibilities of LICQual UK Employees and ATC Staff

LICQual UK employees and ATC staff are expected to:

- **Comply with the policy:** All staff must read, understand, and comply with this Anti-Bribery & Corruption Policy.
- **Avoid conflicts of interest:** Staff should declare any personal or financial interests that could create a conflict with their role or duties.
- **Report concerns:** Any suspected bribery or corruption must be reported immediately to senior management or via the whistleblowing procedure.
- **Maintain transparency:** Ensure that all transactions, gifts, and hospitality are transparent and recorded accurately.

8. Reporting and Whistleblowing

LICQual UK encourages employees and ATC staff to report any concerns regarding bribery or corruption. Employees can report concerns in confidence through:

- **Internal Reporting:** Reporting directly to their line manager, senior management, or designated compliance officer.
- **Whistleblowing:** If employees feel uncomfortable reporting internally, they can report concerns anonymously via our whistleblowing policy.

LICQual UK will ensure that all reports are investigated thoroughly, and no individual will suffer retaliation for raising concerns in good faith.

9. Due Diligence on Third Parties

LICQual UK will conduct due diligence on all third parties (including suppliers, contractors, and agents) involved in our operations to ensure that they are compliant with anti-bribery and anti-corruption laws. This may include:

- Assessing the reputation and business practices of third parties.
- Ensuring that third parties have their own anti-bribery and anti-corruption policies in place.
- Conducting periodic audits and reviews to monitor compliance.

10. Training and Awareness

LICQual UK will provide regular anti-bribery and anti-corruption training for all employees, contractors, and ATC staff. This training will cover:

- The principles of bribery and corruption.
- How to recognize and avoid bribery or corruption.
- How to report suspected incidents.
- The consequences of breaching this policy.

Regular awareness sessions will ensure that all individuals understand the importance of compliance with the policy and their role in preventing bribery and corruption.

11. Monitoring and Review

LICQual UK will regularly monitor and review the effectiveness of this policy. This includes:

- Conducting internal audits and assessments to identify any potential risks of bribery or corruption.
- Reviewing policies and procedures to ensure compliance with legal requirements and best practices.
- Taking corrective action where any issues are identified.

The policy will be reviewed and updated annually, or sooner if required by changes in legislation, business operations, or other relevant factors.

12. Consequences of Non-Compliance

LICQual UK takes non-compliance with this policy very seriously. Any employee or ATC staff found to be involved in bribery or corruption will face disciplinary action, which may include termination of employment or accreditation. Additionally, legal action may be taken against individuals or organizations involved in bribery or corruption.

LICQual UK is committed to maintaining the highest standards of business conduct. This Anti-Bribery & Corruption Policy provides the framework to ensure that we operate with integrity, transparency, and compliance with relevant laws. All employees, contractors, and ATC staff are expected to uphold these standards and contribute to creating an ethical business environment.