

BRIBERY PREVENTION POLICY & PROCEDURES



1. Introduction

1.1 This policy defines standards and guidelines in relation to adherence to the anti-bribery, soliciting for money, intimidation or extortion for monetary gain. In particular, the policy is designed to comply with The Bribery Act 2010

2. Policy

2.1 LTS values its reputation for ethical behaviour and financial probity and reliability. LTS recognises that any involvement in bribery is illegal and will reflect adversely on its image and reputation.

2.2 LTS prohibits the offering, giving, soliciting or the acceptance of any bribe in whatever form to or from any person or company, member, member of staff, contractor, consultant, agent, overseas agent, external examiner and any non-employee service provider engaged on LTS business for whatever reason.

2.3 The prevention, detection and reporting of bribery is the responsibility of all staff.

3. Dealing with contractors, agents and business partners

3.1 The Bribery Act 2010 highlights two specific types of bribery that could lead to prosecution of LTS:

- the liability to prosecution if a person associated with it bribes another person, where an associated person is one who performs services on or behalf of the organisation; and
- bribery of a foreign public official, where an official is one who holds a legislative, administrative or judicial position in a territory or country outside the UK.

3.2 This means that LTS needs to take care to ensure that any contractors, agents or business partners acting on its behalf comply with the Act.

3.3 It is therefore essential that contractors and agents acting on the LTS' behalf are made aware of the anti-bribery policy.

4. Giving gifts and hospitality

4.1 Staff may not, directly or through others, offer or give any, money, gift, hospitality or other thing of value to an official, employee or representative of any supplier, customer or any other organisation, if doing so could reasonably give the appearance of influencing the organisation's relationship with LTS.

4.2 Staff may give gifts of a nominal value such as LTS promotional material, mugs & pens etc. and/or with TM/ATM approval, provide meals and other refreshments to official visitors.

5. Receiving gifts and hospitality

5.1 An employee or any member of their family should not, directly or through others, solicit or accept money, gifts, hospitality or anything else that could influence or reasonably give the appearance of influencing the relationship with that organisation or individual.

5.2 Gifts or hospitality may not be accepted, irrespective of value, which might influence or be seen to influence such situations as the outcome of an exam, the acceptance of a learner onto LTS programmes, or to benefit personally or for the benefit of any person connected to that person.

5.3 Unless you have been informed otherwise you may accept:

- a gift of nominal value, such as an advertising novelty, when it is customarily offered to others having a similar relationship with that individual or organisation;
- refreshments or entertainment provided that the expenses are kept at a reasonable level.

5.4 For the avoidance of doubt:

- gifts with a value of more than £20 and/or hospitality expected to cost in excess of £50 should be authorised by the TM/ATM ;

5.5 If an excessive gift or hospitality is found to have been accepted, then the TM/ATM will investigate with you and agree how to deal with it e.g. a gift can be returned. If a gift or hospitality are accepted are found to have influenced decisions inappropriately, against LTS' policy, then appropriate disciplinary procedures will followed. The police will be informed of any actual or potential illegal activity.

6. Compliance

6.1 All staff are required to comply with The Bribery Act 2010.

6.2 The TM/ATM are responsible for LTS' policy in relation to The Bribery Act 2010.

6.3 A breach of any of the provisions of this Policy will constitute a disciplinary offence and will be dealt with in accordance with the Company's disciplinary procedure. Depending on the gravity of the offence, it may be treated as gross misconduct and could result in summary dismissal. As far as associated persons are concerned, a breach of this policy could lead to the suspension or termination of any relevant contract, subcontract or other agreement.

If you are at any time uncertain as to whether your actions will comply with this policy, you must seek guidance from the TM/ATM.

7. Reporting bribery, corruption and non-compliance with this policy

7.1 If you know of, or have good reason to suspect that, an unlawful or unethical situation or that you suspect that either an act of bribery or non-compliance to this policy has occurred; you should report the matter to the TM/ATM. See Whistle blowing policy.

A handwritten signature in black ink, appearing to read 'Richard W Little', is written over a light blue horizontal line.

Richard W Little – Chairman

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