



Anti Bribery & Corruption Policy

| Version 3.1 |

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1. Introduction

1.1 Staff Power Training (SPT) is committed to the highest standards of ethical conduct and integrity in all our business activities. 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, particularly regarding our responsibilities to learners, awarding organisations, and government funding agencies (e.g., the ESFA).

2. Scope

2.1 This policy applies to all individuals working at all levels, including:

- *Senior managers, officers, and directors.*
- *Employees (whether temporary, fixed-term, or permanent).*
- *Consultants, contractors, and agency staff.*
- *Sub-contracted training partners and external associates.*
- *Any other person associated with us, wherever located.*

3. Key Definitions

3.1 Bribery: Offering, promising, giving, accepting, or soliciting an advantage (financial or otherwise) as an inducement for an action which is illegal, unethical, or a breach of trust.

3.2 Kickbacks: Payments made in return for a business favour or advantage.

3.3 Facilitation Payments: Small, unofficial payments made to secure or speed up a routine government action (e.g., processing a license or visa). These are illegal under UK law.

4. Specific Risks in Adult Education

As a training provider, we have identified high-risk areas where bribery could occur:

4.1 Sub-contracting: Offering inducements to secure a sub-contracting partnership or to overlook poor performance/quality.

4.2 Student Recruitment: Paying "referral fees" to individuals or agents to bypass eligibility checks or secure funding improperly.

4.3 Awarding Organisations: Attempting to influence an external moderator or assessor to secure higher grades or certifications for learners.

4.4 Procurement: Bribery of officials to secure government-funded contracts or grants (e.g., AEB or Apprenticeship funding).

5. Prohibited Activities

It is strictly prohibited for any person covered by this policy to:

- Give, promise to give, or offer a payment, gift, or hospitality with the expectation or hope that a business advantage will be received.
- Accept a gift or hospitality from a third party if you know or suspect it is offered with an expectation of a business advantage in return.
- Offer or accept a gift to/from government officials or representatives of awarding bodies to facilitate or "grease" a process.
- Threaten or retaliate against another worker who has refused to commit a bribery offence or who has raised concerns under this policy.

6. Gifts and Hospitality

We recognise that the moderate exchange of gifts and hospitality can build good business relationships. However, they must meet the following criteria:

6.1 Value: Must not exceed £50 (unless approved in writing by the Finance Director).

6.2 Intent: Must not be made with the intention of influencing a third party or for personal gain.

6.3 Transparency: All gifts (given or received) with a value over £25 must be recorded in the company's Gifts and Hospitality Register.

6.4 Timing: Gifts must not be exchanged during active tender processes or during an external audit/OFSTED inspection.

7. Due Diligence on Third Parties

Before engaging with new sub-contractors, agents, or partners, SPT will perform a risk-based due diligence check. This includes:

- Verifying the entity's reputation and legal standing.
- Including anti-bribery clauses in all written contracts.
- Requiring partners to confirm they have their own anti-bribery procedures in place.

8. Reporting Concerns (Whistleblowing)

If you are offered a bribe, asked to make one, or suspect that any form of bribery or corruption is occurring, you must report it immediately.

8.1 Internal Report: Contact the Director of Operations.

Lee Johnston
Director of Operations

Mackies Corner
Floor 2
High Street West
Sunderland
SR1 1TX

T: 0191 500 3777

M: 07534388829

E: lee@staffpowergroup.com

8.2 Confidentiality: Reports will be treated in the strictest confidence.

8.3 Protection: We are committed to ensuring no one suffers detrimental treatment as a result of reporting in good faith a suspicion that bribery has taken place.

9. Consequences of Breach

9.1 Employees: Any breach of this policy will be regarded as gross misconduct and may lead to summary dismissal.

9.2 External Partners: We will terminate our relationship with individuals and organisations working on our behalf if they breach this policy.

9.3 Legal Action: We reserve the right to report any suspected criminal activity to the police, the SFO, or the National Crime Agency.

10. Monitoring and Review

The Board of Directors has overall responsibility for this policy. It will be reviewed annually to ensure it remains effective and compliant with current legislation (including the Economic Crime and Corporate Transparency Act 2023).