

Anti-Bribery and Incentives Policy

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Approved By:	Group Chief Executive Officer
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Version Control

Version	Date	Author	Changes
1.0	11/08/2025	Patsy Crocker	Initial policy creation
2.0	Jan 2026	Sophie Gilmore	Comprehensive revision: enhanced responsibilities section, detailed risk assessment framework, strengthened due diligence requirements, expanded training provisions

1. Purpose

This policy sets out Hybrid Training Centre's (HTC) position on bribery, corruption, and improper incentives, and provides a framework to ensure compliance with the Bribery Act 2010 and associated legislation. It establishes clear expectations for conduct, reporting procedures, and preventive measures to protect HTC, its employees, learners, and stakeholders.

HTC is committed to conducting all business honestly and ethically. As a provider of government-funded training including apprenticeships, Skills Bootcamps, and commercial programmes, we recognise that maintaining the highest standards of integrity is essential to preserving public trust, protecting funding streams, and safeguarding our reputation with awarding organisations, regulatory bodies, and employer partners.

2. Scope

This policy applies to all individuals working at or for HTC at any level and in any capacity, including:

- Directors, senior leadership team members, and managers
- All permanent, fixed-term, and temporary employees
- Agency workers, consultants, and contractors
- Assessors, trainers, and Internal Quality Assurers (IQAs)
- Volunteers and work experience placements
- Third parties acting on behalf of HTC, including agents, intermediaries, and business partners

The policy covers all HTC activities across all venues and locations, including activities conducted remotely or off-site.

3. Legal Framework and Definitions

3.1 The Bribery Act 2010

The Bribery Act 2010 creates four criminal offences:

- a) **Bribing another person** (Section 1) – offering, promising, or giving a financial or other advantage to induce someone to perform improperly or to reward them for doing so.
- b) **Being bribed** (Section 2) – requesting, agreeing to receive, or accepting a financial or other advantage intending that a function or activity should be performed improperly.
- c) **Bribing a foreign public official** (Section 6) – intending to influence the official to obtain or retain business.
- d) **Failure to prevent bribery** (Section 7) – a commercial organisation is guilty if a person associated with it bribes another person intending to obtain or retain business for the organisation, unless adequate procedures were in place to prevent bribery.

3.2 Penalties

Individuals convicted under the Act face up to 10 years' imprisonment and/or unlimited fines. Organisations face unlimited fines and potential debarment from public contracts. For HTC, conviction could result in loss of ESFA funding, removal from the Register of Apprenticeship Training Providers (RoATP), and withdrawal of awarding organisation approvals.

3.3 Key Definitions

Bribery: Offering, promising, giving, requesting, agreeing to receive, or accepting a financial or other advantage to induce or reward improper performance of a function, or where the recipient's acceptance itself constitutes improper performance.

Facilitation payments: Small unofficial payments made to expedite routine actions. These are illegal under UK law regardless of local practice and are strictly prohibited.

Associated person: Anyone who performs services for or on HTC's behalf, including employees, agents, subcontractors, and consultants.

Improper performance: Performance that breaches a relevant expectation that the person will act in good faith, impartially, or in accordance with a position of trust.

4. Policy Statement

HTC maintains a zero-tolerance approach to bribery and corruption. We are committed to:

- Acting professionally, fairly, and with integrity in all business dealings
- Implementing and enforcing effective systems to prevent bribery
- Complying with all applicable laws and regulations in every jurisdiction where we operate
- Investigating all reports of suspected bribery thoroughly and impartially
- Taking appropriate disciplinary action where breaches are substantiated
- Protecting individuals who report concerns in good faith from retaliation

5. Responsibilities

5.1 Board and Senior Leadership

The Board and Senior Leadership Team are responsible for:

- Setting the tone from the top and demonstrating commitment to ethical conduct
- Ensuring adequate resources are available for policy implementation
- Reviewing risk assessments and monitoring compliance annually
- Receiving and acting upon reports of serious concerns

5.2 Chief Operating Officer (Policy Owner)

The COO has operational responsibility for:

- Implementing and maintaining this policy and associated procedures
- Conducting annual risk assessments and updating the risk register
- Ensuring appropriate training is delivered and recorded
- Overseeing investigations into reported concerns
- Reporting to the Board on compliance matters

5.3 Line Managers

All managers are responsible for:

- Ensuring their teams understand and comply with this policy
- Identifying and escalating potential risks within their areas
- Modelling ethical behaviour and creating a culture where concerns can be raised
- Ensuring new team members complete anti-bribery training during induction

5.4 All Staff

All individuals covered by this policy must:

- Read, understand, and comply with this policy
- Complete required anti-bribery training
- Report suspected breaches through the appropriate channels
- Refuse any bribe offered and report it immediately
- Seek guidance when uncertain about the appropriateness of any action

6. Prohibited Conduct

The following conduct is strictly prohibited. Individuals must not:

- Offer, promise, or give any financial or other advantage to improperly influence any person's actions
- Request, agree to receive, or accept any financial or other advantage as an inducement or reward for improper performance
- Make facilitation payments under any circumstances (except genuine life-threatening emergencies – see Section 7)
- Offer or accept gifts, hospitality, or sponsorship that could reasonably be perceived as intended to influence business decisions
- Use third parties as a conduit to channel bribes
- Threaten or retaliate against anyone who refuses to commit a bribery offence or who reports concerns

Training provider context: This prohibition extends to any attempt to influence awarding organisation decisions, regulatory inspections, funding body audits, EPA outcomes, or employer partner relationships through improper means.

7. Gifts, Hospitality, and Sponsorship

7.1 Principles

HTC recognises that modest gifts and hospitality are a normal part of business relationships. However, all gifts and hospitality must be:

- **Transparent** – recorded in the Gifts and Hospitality Register
- **Proportionate** – reasonable in value and appropriate to the business relationship
- **Legitimate** – for proper business purposes with no expectation of return favour
- **Infrequent** – not repeated to the same recipient in a way that could appear improper

7.2 Permitted and Prohibited

Generally Acceptable	Not Permitted
• Token promotional items (pens, calendars) • Modest refreshments at business meetings • Flowers or chocolates (under £25) • Industry conference attendance	• Cash or cash equivalents (gift cards) • Alcohol of any value • Gifts exceeding £50 without approval • Lavish entertainment or hospitality

All gifts and hospitality exceeding £25 in value (given or received) must be recorded in the Gifts and Hospitality Register maintained by the COO. Gifts exceeding £50 require prior approval from the Group CEO.

7.3 Sponsorship

Sponsorship contributions must be transparent, proportionate, and for legitimate business purposes. All sponsorship agreements exceeding £500 require prior approval from the COO and must be documented with clear terms setting out the benefits to HTC and any branding or publicity arrangements.

8. Facilitation Payments

Facilitation payments are strictly prohibited. If an employee is faced with a demand for such a payment and genuinely believes there is an imminent threat to their life or physical safety, they may make the minimum payment necessary to address the emergency. In such circumstances, the employee must:

1. Report the payment to the COO as soon as safely possible
2. Provide full written details including date, amount, recipient, and circumstances
3. Retain any receipts or evidence

Any request for facilitation payments must be reported immediately, even if refused.

9. Risk Assessment

HTC conducts annual bribery risk assessments considering:

- **Country risk** – while HTC primarily operates in the UK, any international activities are assessed for corruption risk
- **Sector risk** – education and training receives significant public funding, creating potential targets for fraud
- **Transaction risk** – procurement, contractor appointments, and large purchases are assessed for bribery risk

- **Business partner risk** – relationships with employers, subcontractors, and agents are evaluated
- **Internal risk** – potential vulnerabilities in processes, controls, and staff awareness

Risk assessment findings are recorded in the Risk Register and inform preventive measures, training priorities, and due diligence requirements.

10. Due Diligence

Proportionate due diligence is conducted on all persons and organisations performing services for or on behalf of HTC. This includes:

10.1 Standard Due Diligence (all third parties)

- Verification of identity and legal status
- Confirmation of business registration and credentials
- Reference checks where appropriate
- Communication of HTC's anti-bribery policy requirements

10.2 Enhanced Due Diligence (higher-risk relationships)

- Detailed background checks
- Assessment of beneficial ownership
- Review of the third party's own anti-bribery policies and procedures
- Inclusion of specific anti-bribery contractual clauses
- Ongoing monitoring throughout the relationship

Enhanced due diligence applies to agents, intermediaries, subcontractors providing delivery on funded programmes, and any relationship where the risk assessment identifies elevated concerns.

11. Training and Communication

11.1 Training Requirements

Staff Category	Training	Frequency
All new staff	Induction awareness training	Within first month
All existing staff	Annual refresher	Annually
Higher-risk roles	Enhanced training	On appointment and annually

Higher-risk roles include those involved in procurement, finance, business development, and management of external relationships.

11.2 Communication

This policy is communicated to all staff and associated persons through induction processes, the staff handbook, annual policy reminders, and posting on the staff intranet. Third parties are informed of relevant requirements at the commencement of business relationships.

12. Reporting Concerns

Any individual who suspects or becomes aware of potential bribery must report it. Reports can be made through:

- Line manager (where appropriate)

- Chief Operating Officer
- Group CEO
- Via the Whistleblowing Policy procedures

All reports will be treated in confidence to the extent possible. Individuals who report concerns in good faith will be protected from retaliation in accordance with the Whistleblowing Policy. All allegations will be logged in the Risk Register and fully investigated.

13. Breaches of this Policy

Breaches of this policy are treated extremely seriously and may result in:

- **Employees:** Disciplinary action up to and including summary dismissal for gross misconduct
- **Third parties:** Immediate termination of contract or business relationship
- **All persons:** Referral to law enforcement authorities where criminal conduct is suspected

HTC will cooperate fully with any external investigating body.

14. Monitoring and Review

This policy and its effectiveness are monitored through:

- Annual risk assessment review by the COO
- Review of the Gifts and Hospitality Register
- Analysis of any reported concerns and investigation outcomes
- Training completion rates
- Annual report to the Board

The policy is reviewed annually or sooner if there are significant changes to legislation, guidance, or HTC's risk profile.

15. Related Documents

- Whistleblowing Policy
- Fraud Prevention Policy
- Conflict of Interest Policy
- Code of Conduct / Business Ethics Policy
- Disciplinary Policy and Procedure
- Procurement Policy

Policy Approval

Signature:

Date:

Sophie Gilmore

Group Chief Executive Officer