



Anti Bribery, Fraud & Conflict of Interest Policy

© Skills People Group



1. Introduction

Skills People Group consists of the following companies.

- *Construction Skills People*
- *C&G Assessments and Training Ltd*
- *Training Futures UK Ltd.*

The Company is committed to the highest standards of ethical conduct and integrity in its business activities and as such, we will not tolerate any form of bribery or fraudulent activity within the organisation or directed to any person within the organisation.

Every employee and individual acting on the organisation's behalf is responsible for maintaining the organisation's reputation and for conducting company business honestly and professionally.

The Bribery Act 2010 came into force on 1st July 2011 which made it a criminal offence to offer, promise or accept a bribe. All employees and associated persons are required to comply with this policy, in accordance with the Bribery Act 2010.

2. Overview

This policy outlines the company's position on preventing and prohibiting bribery, fraudulent activity and activities which conflict with the interest of the Company.

The Company will not tolerate any form of bribery or fraudulent activity by, or of, its employees, agents or consultants or any person or body acting on its behalf. The Company is committed to implementing effective measures to prevent, monitor and eliminate bribery and fraudulent activity. Any activity which may be considered to be a conflict of interest with the Company, must be authorised by a Company Director and disclosed to the HR Manager.

3. Anti-Bribery, Fraud & Conflict of Interest Policy

What is a bribe?

A bribe is a financial advantage or other reward that is offered to, given to, or received by an individual or company (whether directly or indirectly) to induce or influence that individual or company to perform public or corporate functions or duties improperly.

What is fraud?

The definition of fraud is the wrongful or criminal deception intended to result in financial or personal gain.

Employees and others acting for or on behalf of the organisation are strictly prohibited from making, soliciting or receiving any bribes or unauthorised payments.

As such you should not offer, promise, give, request, agree to receive, or accept any bribes:

- During the course of employment;
- When conducting company business; or
- When representing the organisation in any other capacity.

What is a conflict of interest?

A conflict of interest arises when what is in a person's best interest is not in the best interest of another person or organisation to which that individual owes loyalty.

As per CITB scheme rules, any delivery staff who work for more than one provider must declare this information to any new or existing training provider they work for. All trainers will be sent a copy of the declaration of interest form and maintained by HR on its matrix.

Procedure for offering or accepting gifts, hospitality etc.

Any gifts, rewards or entertainment received or offered from clients, public officials, suppliers or other business contacts should be reported immediately to your Line Manager. The Company require that all staff always act with honesty and integrity and to safeguard the organisation's resources for which they are responsible.

In certain circumstances, it may not be appropriate to retain such gifts or be provided with the entertainment and employees and associated persons may be asked to return the gifts to the sender or refuse the entertainment, for example, where there could be a real or perceived conflict of interest. As a general rule, small tokens of appreciation, such as flowers or a bottle of wine, may be retained by employees.

If you wish to provide gifts to suppliers, clients or other business contacts, prior written approval must be obtained from a Company Director. These will be authorised only in limited circumstances and must be proportionate, reasonable and made in good faith.

Employees must disclose any business or personal relationships held as well as financial or property interests held that could potentially result in conflict of interest. This disclosure must be submitted and authorised by a Company Director or HR Manager. Failure to do so may result in disciplinary action.

Reporting suspected bribery, fraud & conflict of interest

Any concerns should be reported to the HR department as soon as possible. Issues that should be reported include:

- any suspected or actual attempts at bribery and / or fraud;
- concerns that other employees or associated persons may be being bribed, are involved in fraudulent activity or have conflicting interests with the Company; or
- concerns that other employees or associated persons may be bribing third parties, such as clients or government officials.

In line with our whistle-blowing policy, any person who reports instances of bribery, fraud or any conflict of interests along with suspected bribery, fraud or conflicts of interests in good faith will be supported by the Company. We will take your concerns seriously and will ensure that you are not subjected to detrimental treatment as a consequence of your report. An instruction to cover up wrongdoing is itself a disciplinary offence. If told not to raise or pursue any concern, even by a person in authority such as a manager, you should not agree to remain silent.

Action by the company

We will fully investigate any instances of alleged or suspected bribery, fraud and conflict of interest. Employees suspected of bribery and / or fraud and / or activities which are a conflict of interest may be suspended from their duties while the investigation is being carried out. The Company will

invoke its disciplinary procedures where any employee is suspected of bribery or being involved in fraudulent activity, and proven allegations may result in a finding of gross misconduct and immediate dismissal.

Any instances of detrimental treatment by a fellow employee towards any person who raises their concerns will be treated as a disciplinary offence.

The Company may also report any matter to the relevant authorities, including the Director of Public Prosecutions, Serious Fraud Office, Revenue and Customs Prosecutions Office and the police. The Company will provide all necessary assistance to the relevant authorities in any subsequent prosecution.

Penalties

A breach of the organisation's anti-bribery, fraud and conflict of interest policy by an employee will be treated as grounds for disciplinary action, up to and including dismissal.

You should be aware that bribery is a criminal offence that may result in up to 10 years' imprisonment and/or an unlimited monetary fine for the individual accepting, offering or attempting to cover up a bribe along with an unlimited fine for the organisation.

Records

Accurate, detailed and up-to-date records of all corporate hospitality, entertainment or gifts accepted or offered must be kept.

If you are offered any gift or hospitality, you should report the matter to your Line Manager. A record of all offers will be kept.

If you offer any gift or hospitality to any person, or organisation, you must first obtain permission from a Company Director and the offer must be properly recorded.

4. Retention

Employee files will be securely retained. For further details of retention periods, please refer to the Document Retention Policy.

5. Right to Access Rights to Information

Employees and third-party partners have individual rights to access personal data that is being held about them either on computer or in manual files. Any person who wishes to exercise this right is required to submit a subject access request to The Data Protection Officer.

Refer to the following policy for further information.

- *Subject Access Request Policy*

Document Control

Date of change	Version	Overview of amendment	Amended by (Job title)	Approved by	Approval date
16-10-18	4	Policy revised, and cover sheet added.	Quality Manager	Senior Management Team	16-10-18
10-03-19	5	Policy revised & integrated fraud, bribery & conflict of interest policy into one, retention & rights to access information have been included.	Sarah Booth (HR Assistant)	Tom Armstrong	10-03-19