



Bribery Prevention Policy Statement

Issued: 01 May 2016
Last Reviewed: 16 May 2025
Next Review: May 2027

Bribery is a criminal offence. Concrew Training and its representatives do not, and will not, pay bribes or offer improper inducements to anyone for any purpose, nor do we, nor will we, accept bribes or improper inducements. We do not, and will not, engage indirectly nor encourage bribery in any form. This includes the transfer of gifts, monies, favours and any other form of hidden incentive either directly or via third parties.

We are committed to the prevention, deterrence and detection of bribery. We have a zero tolerance approach towards bribery and all forms of corruption at all times and in all business operations, including tendering and contracting.

Bribery Definition

Bribery is an inducement or reward offered, promised or provided to gain personal, commercial, regulatory or contractual advantage. It is prohibited under the Bribery Act with four possible categories of offence, including failing to prevent bribery

1. Bribery of another person
2. Accepting a bribe
3. Bribing a foreign official
4. Failing to prevent bribery

Bribery is not tolerated. It is unacceptable to:

General Prohibitions

- give, promise to give, or offer a payment, gift or hospitality with the expectation or hope that a business advantage will be received, or to reward a business advantage already given
- give, promise to give, or offer a payment, gift or hospitality to a government official, agent or representative to "facilitate" or expedite a routine procedure
- accept payment from a third party that you know or suspect is offered with the expectation that it will obtain a business advantage for them
- accept a gift or hospitality from a third party if you know or suspect that it is offered or provided with an expectation that a business advantage will be provided by us in return

Prohibition of Facilitation Payments

- Facilitation payments are not tolerated and are illegal. Facilitation payments are unofficial payments made to public officials in order to secure or expedite actions.
- Gifts and hospitality are not to be accepted by any person. This excludes nominal gifts and hospitality up to a financial value of £25, which must be reported to the Director immediately and on each occasion.

Policy Objectives

This policy provides a coherent and consistent framework to enable the organisation's employees and partners to understand and implement arrangements enabling compliance. It also helps employees and partners to identify and effectively report any breaches or suspected breaches.

We require that all our workforce, including temporary agency staff, partners and contractors to:

- Act honestly and with integrity at all times
- Comply with the spirit, as well as the letter, of the laws and regulations of all legislation and the scope of this policy
- Accept that responsibility to control and prevent the risk of bribery is the responsibility of all staff
- Accept that this policy covers all personnel, at all levels and grades, including those permanently employed, temporary agency staff, contractors, non-executives, agents, volunteers and consultants.

Commitment to Action

Concrew Training commits to:

- Setting out a clear anti-bribery policy, reviewing it bi-annually or more often as needed
- Making all employees aware of their responsibilities to adhere strictly to this policy at all times
- Training all employees so that they can recognise and avoid bribery by themselves and others
- Encouraging its employees to be vigilant and to report any suspicions of bribery
- Rigorously investigating instances of alleged bribery and assist appropriate authorities
- Taking firm and vigorous action against any individual/s involved in bribery
- Provide information to all employees to report breaches and suspected breaches of this policy
- Include appropriate clauses in partnership/sub-contracting agreements contacts to prevent bribery

Reporting and Raising Concerns

This organisation is committed to providing a safe, reliable and confidential way of reporting any suspicious activity. We want each and every person to know how they can raise concerns. In the event of concerns the sooner people act, the sooner matters can be resolved.

- All those covered by the policy are required to
 - read and agree it, Ensure they, understand and comply with it
 - raise concerns as soon as possible if they believe or suspect that a conflict with this policy has occurred, or may occur in the future.
- Anyone found to be in breach of this policy will face disciplinary action, which could result in dismissal
- Any incident of bribery or corruption, suspected or otherwise must be reported to the Director immediately.
- Concerns can be raised anonymous

In the event that an incident of bribery, corruption, or wrongdoing is reported, we will act as soon as possible to evaluate the situation. Staff who refuse to accept or offer a bribe, or those who raise concerns or report wrongdoing can be worried about the repercussions. We aim to encourage openness and will support anyone who raises a genuine concern in good faith under this policy, even if they turn out to be mistaken. We are committed to ensuring nobody suffers detrimental treatment by refusing to take part in bribery or by reporting a concern in good faith.

The effectiveness of this policy and associated arrangements is reviewed bi-annually

REVIEW



Ian Hirst Director

Issued: 01 May 2016
Last Reviewed: 16 May 2025
Next Review: May 2027