



## **Internal Policy: Anti-Bribery and Corruption Policy**

This anti-bribery policy exists to set out the responsibilities of Career Hounds and those who work with and for us, with regard to observing and upholding our zero-tolerance position on bribery and corruption.

It also exists to act as a source of information and guidance for those working with and for Career Hounds. It helps them recognise and deal with bribery and corruption issues, as well as understanding their responsibilities.

### **Policy statement**

Career Hounds is committed to conducting business in an ethical and honest manner and is committed to implementing and enforcing systems that ensure bribery is prevented. Career Hounds has zero-tolerance for bribery and corrupt activities. We are committed to acting professionally, fairly, and with integrity in all business dealings and relationships, wherever in the country, and world we operate.

Career Hounds will constantly uphold all laws relating to anti-bribery and corruption in all the jurisdictions in which we operate. We are bound by the laws of the UK, including the Bribery Act 2010, regarding our conduct both at home and abroad.

Career Hounds recognises that bribery and corruption are punishable by up to ten years of imprisonment and a fine. If our company is discovered to have taken part in corrupt activities, we may be subjected to an unlimited fine, be excluded from tendering for public contracts, and face serious damage to our reputation. It is with this in mind that we commit to preventing bribery and corruption in our business and take our legal responsibilities seriously.

### **Who is covered by the policy?**

This anti-bribery policy applies to all employees within Career Hounds and all employees within all Training Providers; including but not limited to (whether temporary, fixed-term, or permanent), contractors, tutors, trainees, seconded staff, home workers, casual workers, agency staff, volunteers, or any other person or persons associated with us (including third parties), or any of our subsidiaries or their employees, no matter where they are located (within or outside of the UK). The policy also applies to Officers, Trustees, Board, and/or Committee members at any level.

In the context of this policy, third-party refers to any individual or organisation (insert organisations name) meets and works with.

Any arrangements Career Hounds makes with a third party is subject to clear contractual terms, including specific provisions that require the third party to comply with minimum standards and procedures relating to anti-bribery and corruption.

Career Hounds agrees and has signed the Enforceable Agreement to confirm this policy forms part of their commitment to becoming a recognised Training Provider with the awarding body.

All employees of Hardwick Hounds sign the induction document to confirm they also agree to adhere to all policies and procedures including this Anti-Bribery and Corruption Policy.

### **Definition of bribery**

Bribery refers to the act of offering, giving, promising, asking, agreeing, receiving, accepting, or soliciting something of value or of an advantage so to induce or influence an action or decision.

A bribe refers to any inducement, reward, or object/item of value offered to another individual in order to gain commercial, contractual, regulatory, or personal advantage.

Bribery legislation is not limited to the act of offering a bribe. If an individual is on the receiving end of a bribe, they are also breaking the law.

Bribery is illegal. Employees must not engage in any form of bribery, whether it be directly, passively or through a third party. They must not accept bribes in any degree and if they are uncertain about whether something is a bribe or a gift or act of hospitality, they must seek further advice from Career Hounds quality manager or senior person.

### **What is and what is NOT acceptable**

This section of the policy refers to 4 areas:

- Gifts and hospitality.
- Facilitation payments.
- Political contributions.
- Charitable contributions.

### **Gifts and hospitality**

Career Hounds accepts normal and appropriate gestures of hospitality and goodwill (whether given to/received from third parties) so long as the giving or receiving of gifts meets the following requirements:

- It is not made with the intention of influencing the party to whom it is being given, to obtain or reward the retention of a business or a business advantage, or as an explicit or implicit exchange for favours or benefits.
- It is not made with the suggestion that a return favour is expected.
- It complies with the local law.
- It is given in the name of the company, not in an individual's name.
- It does not include cash or a cash equivalent (e.g. a voucher or gift certificate).
- It is appropriate for the circumstances (e.g. giving small gifts around Christmas or as a small thank you to a company for helping with a large project upon completion).
- It is of an appropriate type and value and given at an appropriate time, considering the reason for the gift.
- It is given/received openly, not secretly.
- It is not selectively given to a key, influential person, clearly with the intention of directly influencing them.
- It is not above a certain excessive value, as pre-determined by the company's Responsible Officer (usually in excess of £100).
- It is not offered to, or accepted from, a government official or representative or politician or political party, without the prior approval of the company's Responsible Officer.

Where it is inappropriate to decline the offer of a gift (i.e. when meeting with an individual of a certain religion/culture who may take offence), the gift may be accepted so long as it is declared to the Responsible Officer, who will assess the circumstances.



Career Hounds recognises that the practice of giving and receiving business gifts varies between countries, regions, cultures, and religions, so definitions of what is acceptable and not acceptable will inevitably differ for each.

As good practice, gifts given and received should always be disclosed to the Responsible Officer.

The intention behind a gift being given/received should always be considered. If there is any uncertainty, the advice of the Responsible Officer should be sought.



## Career Hounds Training Academy Employees responsibilities

As an employee of Career Hounds, you must ensure that you read, understand, and comply with all the information contained within this policy, and with any training or other anti-bribery and corruption information you are given.

All employees and those under our control are equally responsible for the prevention, detection, and reporting of bribery and other forms of corruption. They are required to avoid any activities that could lead to, or imply, a breach of this anti-bribery policy.

You must:

- not offer, promise or give a bribe for yourself or on behalf of Career Hounds
- not seek or accept any bribe either for yourself or on behalf of Career Hounds
- not offer, promise or give any facilitation payment for yourself or on behalf of the CareerHounds
- if requested to do so by the Responsible Officer, complete and ensure that employees who are also providing services to Career Hounds complete any anti-bribery training; and
- notify the Responsible Officer as soon as possible if you believe or suspect that bribery has taken place or is likely to take place

If you have reason to believe or suspect that an instance of bribery or corruption has occurred or will occur in the future that breaches this policy, you must notify the Quality manager or senior person.

If any employee breaches this policy, they will face disciplinary action and could face dismissal for gross misconduct or even criminal proceedings. Career Hounds has the right to terminate a contractual relationship with an employee or Training Provider if they breach this anti-bribery policy.

## What happens if I need to raise a concern?

This section of the policy covers 3 areas:

- How to raise a concern.
- What to do if you are a victim of bribery or corruption.
- Protection.

### How to raise a concern

If you suspect that there is an instance of bribery or corrupt activities occurring in relation to Career Hounds you are encouraged to raise your concerns at as early a stage as possible. If you're uncertain about whether a certain action or behaviour can be considered bribery or corruption, you should speak to your Line Manager, Internal Quality Assurer, External Quality Assurer or Responsible Officer.

Career Hounds will familiarise all employees with its whistleblowing procedures so employees can vocalise their concerns swiftly and confidentially.

### What to do if you are a victim of bribery or corruption

You must tell your Line Manager or other reporting lines as soon as possible if you are offered a bribe by anyone, if you are asked to make one, if you suspect that you maybe bribed or asked to make a bribe in the near future, or if you have reason to believe that you are a victim of another corrupt activity.



### **Protection**

If you refuse to accept or offer a bribe or you report a concern relating to potential act(s) of bribery or corruption, Career Hounds understands that you may feel worried about potential repercussions. Career Hounds will support anyone who raises concerns in good faith under this policy, even if an investigation finds that they were mistaken.

Career Hounds will ensure that no one suffers any detrimental treatment as a result of refusing to accept or offer a bribe or other corrupt activities or because they reported a concern relating to potential act(s) of bribery or corruption.

Detrimental treatment refers to dismissal, disciplinary action or unfavourable treatment in relation to the concern the individual raised.

If you have reason to believe you've been subjected to unjust treatment as a result of a concern or refusal to accept a bribe, you should inform your Line Manager or the Responsible Officer immediately.

### **Training and communication**

Career Hounds will provide training on this policy as part of the induction process for all new employees and Training Providers. Employees will also receive regular, relevant training on how to adhere to this policy, and will be asked annually to formally accept that they will comply with this policy.

Career Hounds's anti-bribery and corruption policy and zero-tolerance attitude will be clearly communicated to all suppliers, contractors, business partners, and any third-parties at the outset of business relations, and as appropriate thereafter.

Career Hounds will provide relevant anti-bribery and corruption training to employees and other related parties where we feel their knowledge of how to comply with the Bribery Act needs to be enhanced. As good practice, all businesses should provide their employees with anti-bribery training where there is a potential risk of facing bribery or corruption during work activities.

### **Record keeping**

Career Hounds will keep detailed and accurate financial records, and will have appropriate internal controls in place to act as evidence for all payments made. We will declare and keep a written record of the amount and reason for hospitality or gifts accepted and given and understand that gifts and acts of hospitality are subject to managerial review by the Responsible Officer.

### **Monitoring and reviewing**

Career Hounds Quality manager or senior person is responsible for monitoring the effectiveness of this policy and will review the implementation of it on a regular basis. They will assess its suitability, adequacy, and effectiveness.

Internal control systems and procedures designed to prevent bribery and corruption are subject to regular audits to ensure that they are effective in practice within Career Hounds itself and during the External Quality Assurance audits.