

Introduction

The 2010 Bribery Act places a statutory obligation on organisations to ensure that they have policies and procedures in place to prevent bribery and corruption in its activities. A 'Quick Start Guide' to the Act can be found at

<https://www.justice.gov.uk/downloads/legislation/bribery-act-2010-quick-start-guide.pdf>

The British Accreditation Council (BAC) is committed to maintaining the highest level of ethical standards in the conduct of its activities and to act professionally, fairly and with integrity in all our activities, both in the United Kingdom (UK) and internationally. Therefore, whilst recognising that this presents a low risk, we are committed to implementing and enforcing effective systems to ensure that bribery and corruption play no part in how we conduct our affairs and that we are compliant with the requirements of the Act.

So far as inspectors are concerned, the code of conduct that they sign includes references to standards of personal conduct and a specific reference to guarding against circumstances which might compromise an inspector's personal integrity. It mentions, particularly, that inspectors shall not accept inducements to show favour.

The purpose of this document, therefore, is to build on the inspectors' code of conduct and to set out BAC's policy in relation to bribery and corruption, which applies strictly **to all Trustees, employees, agents, consultants, contractors and inspectors as well as to any other people or bodies associated with BAC.**

Understanding and recognising bribery and corruption

Acts of bribery or corruption are designed to influence an individual in the performance of their duty and incline them to act in a way that a reasonable person would consider to be dishonest in the circumstances.

Bribery can be defined as "offering, promising or giving a financial or other advantage to another person with the intention of inducing or rewarding that person to act or for having acted in a way which a reasonable person would consider improper in the circumstances". Corruption is any form of abuse of entrusted power for private gain and may include, but is not limited to, bribery.

Bribes are not always a matter of handing over cash. Gifts, hospitality and entertainment can be bribes if they are intended to influence a decision.

BAC's policy

BAC prohibits the offering, giving, solicitation or the acceptance of any bribe or corrupt inducement, whether in cash or in any other form.

For inspectors, consultants, agents and contractors such inducements would include the following:

- The acceptance of gifts, other than low value gifts such as branded pens, notebooks and coffee mugs.
- The acceptance of any financial inducement
- The offer of employment or consultancy work in return for interpreting inspection evidence in a favourable (or unfavourable) light
- Offers of hospitality, for example invitations to lunches and dinners, other than a light working sandwich lunch or similar during the inspection. This latter practice also contributes to the effective use of the inspection time and can be combined with meetings with staff and/or students if appropriate. Where possible, inspectors should offer to pay for such hospitality but not to the extent that it causes offence.

At all times, inspectors are asked to use their professionalism and common sense to decide what constitutes acceptable gifts and normal hospitality (as set out above) and what constitutes an inducement. They should also be aware of cultural differences in making this judgement.

If anyone is in any doubt as to whether a possible act might be in breach of this policy, they must contact the BAC head office for advice.

Institutions to be inspected will be advised of BAC's policy, in advance of the inspection.

For BAC's Trustees and employees, such inducements would include the following:

- The acceptance of gifts, other than low value gifts such as branded pens, notebooks and coffee mugs
- The acceptance of any financial inducement
- The offer of consultancy work whilst employed by BAC (employees only)
- Excessive offers of hospitality such as trips and events beyond the immediate needs of business requirements. Business lunch and dinners would be considered acceptable for business development purposes

At all times, BAC's Trustees and staff are asked to use their professionalism and common sense to decide what constitutes acceptable gifts and normal hospitality (as set out above) and what constitutes an inducement. They should also be aware of cultural differences in making this judgement.

If anyone is in any doubt as to whether a possible act might be in breach of this policy, they must contact the BAC head office for advice.

BAC will investigate thoroughly any actual or suspected breach of this policy or the spirit of this policy and appropriate action will be taken as required.

Whistleblowing

Inspectors or employees who believe that a breach of this policy has occurred or is likely to occur must report this, in the first instance, to the Chief Executive.

Institution to Institution Gifts

It is common amongst certain cultures to exchange institution to institution gifts, normally cultural or academic artefacts. These are acceptable provided they are displayed and stored within BAC premises

Monitoring

The effectiveness of this policy will be reviewed annually by the Council and up-dated as required. Internal control systems and procedures will be subject to audit by the Audit Committee.