

(NOTE: Throughout this document, THE TEACHER TRAINER LTD is referred to as TTT)

TTT POLICY DOCUMENT

Anti-Bribery and Corruption Policy

TTT's zero-tolerance approach to bribery and corruption, aligned with the Bribery Act 2010.

Document Control

Document Title	Anti-Bribery and Corruption Policy
Version	1.0
Effective Date	22 April 2026
Next Review Date	22 April 2027
Policy Owner	Phenil Mehta, Centre Manager
Reporting Contact	phenil@theteachertrainer.co.uk
Approved By	Phenil Mehta, Centre Manager
Classification	Public
Applies To	All TTT staff, associates, contractors, resellers and any third party acting for TTT

Anti-Bribery and Corruption Policy

1. Purpose

This policy sets out TTT's zero-tolerance approach to bribery and corruption, in line with the Bribery Act 2010 and the Ministry of Justice guidance on adequate procedures. It protects TTT from criminal and civil liability, protects learners, staff and associates from exposure to corrupt practice and upholds the integrity of TTT's assessment, commercial and operational decisions.

2. Scope

This policy applies to:

- All TTT employees, associates, contractors, volunteers, directors and officers
- All third parties performing services for or on behalf of TTT, including resellers, suppliers, agents and consultants
- All TTT activity wherever it takes place, including in jurisdictions outside the United Kingdom

3. Definitions

The following terms carry the meanings given throughout this policy.

Bribery	Offering, promising, giving, requesting or accepting any financial or other advantage with the intention of inducing improper performance of a function or activity or as a reward for such performance.
Corruption	The abuse of entrusted power for private gain.
Facilitation Payment	A small, unofficial payment made to secure or expedite a routine action by a public official. Facilitation payments are a form of bribery under the Bribery Act 2010 and are prohibited.
Gift	Anything of value, including cash, vouchers, goods, services or discounts, given or received.
Hospitality	Meals, drinks, tickets to events, accommodation, travel, conferences and similar, given or received.
Associated Person	Any person who performs services for or on behalf of TTT, whether or not under a contract of employment. TTT can be liable under Section 7 of the Bribery Act for bribes paid by an Associated Person unless adequate procedures are in place.

4. Policy Statement

TTT is committed to the following principles and commitments.

1. TTT operates a zero-tolerance approach to bribery and corruption in any form and wherever it occurs.

2. TTT does not offer, promise, give, solicit or accept bribes, kickbacks or facilitation payments.
3. TTT maintains adequate procedures proportionate to its size and risk profile, as the Section 7 Bribery Act defence requires.
4. Gifts and hospitality are subject to the limits and transparency in Sections 7 and 8.
5. Conflict of interest is a separate but related risk handled under the Conflict of Interest Policy.
6. Concerns about bribery or corruption are raised through the routes in Section 11 and are protected under the Whistleblowing Policy.
7. Every individual and third party in scope receives communication of this policy and, where their role warrants it, training on it.

5. The Six Bribery Act Principles

TTT's anti-bribery procedures follow the six principles set out in the Ministry of Justice guidance.

Principle	How TTT applies it
Proportionate procedures	Procedures are proportionate to TTT's size and bribery risk exposure (moderate in UK-based FE delivery).
Top-level commitment	The Centre Manager explicitly commits to and communicates this policy to all staff and third parties.
Risk assessment	A bribery risk assessment is carried out at least annually, covering reseller relationships, international learners, gifts and procurement.
Due diligence	Risk-based due diligence is carried out on new resellers, suppliers and significant contractors.
Communication and training	All staff receive this policy at induction and annually; higher-risk roles receive role-specific training.
Monitoring and review	The policy is reviewed annually and promptly after any incident or change in law.

6. Prohibited Conduct

The following are prohibited.

- Offering, promising, giving, requesting or accepting a bribe
- Paying facilitation payments or kickbacks of any kind
- Using another person or organisation to make or receive a payment that this policy would prohibit
- Giving or accepting gifts or hospitality intended to influence a business decision
- Accepting any gift or hospitality where the timing, context or circumstances raise a reasonable concern about influence (for example, during an open tender, active assessment decision or appeals case)
- Donating to political parties, candidates or officials on behalf of TTT

- Making charitable donations intended to secure or reward improper performance
- Retaliating against a person who has refused to commit a bribe or who has raised a concern in good faith

7. Gifts and Hospitality

TTT recognises that modest gifts and hospitality are an ordinary part of business, but applies limits and transparency to prevent actual or perceived improper influence.

Value / Context	Action
Below £25 (nominal, promotional branded items, modest thank-you gifts)	Acceptable; no declaration required, but consider recording if repeated
£25 to £75	Record in the Gifts and Hospitality Register within 7 calendar days; line manager or Centre Manager informed
£75 or above	Prior written approval of the Centre Manager required; enter in the Register; decline where approval is not given
Cash or cash-equivalents (vouchers, gift cards)	Declined regardless of amount
Gifts from a learner awaiting an assessment, appeal or refund decision	Declined, with a polite written explanation; the Centre Manager is informed
Hospitality: reasonable business meals, conference attendance	Acceptable where proportionate and business-related; recorded in the Register if value exceeds £25
Hospitality: travel, accommodation or entertainment of significant value	Prior written approval of the Centre Manager required
Any gift or hospitality from a public official	Particular caution; approval and recording required regardless of value

8. Gifts and Hospitality Register

TTT maintains a Gifts and Hospitality Register recording:

- Date of the gift or hospitality
- Giver or recipient, including organisation
- Description and estimated value
- Business rationale
- Whether accepted or declined and by whom
- Approver (where £75 or above)

The Register is reviewed annually by the Centre Manager and is retained for 6 years.

9. Third Parties, Resellers and Suppliers

- Risk-based due diligence is performed on new resellers and significant suppliers before engagement, including checks relevant to corruption risk where the jurisdiction or sector warrants
- Contracts include anti-bribery clauses requiring compliance with this policy and giving TTT the right to audit and terminate
- Resellers are reminded of this policy at onboarding and through the Reseller Policy and Agreement
- Where an incident at a third party raises credible concern, TTT suspends engagement pending investigation

10. Charitable and Political Contributions

- TTT does not make political donations
- Charitable donations by TTT are transparent, recorded and made only to recognised charities; they are never made to secure or reward improper performance
- Staff personal donations are the individual's own matter, provided they do not use TTT resources or imply TTT endorsement

11. Reporting Concerns

- Any suspected bribery or corruption is reported to the Centre Manager at phenil@theteachertrainer.co.uk without delay
- Where the Centre Manager is the subject of concern, the matter is reported to the Alternative Contact (Shaily Mehta, shaily@theteachertrainer.co.uk) under the Whistleblowing Policy
- External reporting routes include Action Fraud (actionfraud.police.uk or 0300 123 2040), the Serious Fraud Office, the National Crime Agency and the Police
- No individual will suffer detriment for refusing a bribe or raising a concern in good faith; retaliation is itself a serious breach of this policy

12. Roles and Responsibilities

Role	Responsibility
Centre Manager (Phenil Mehta)	Overall accountability; approves gifts and hospitality above £75; maintains Register; signs off third-party due diligence; leads investigations; reviews this policy annually.
Course Coordinator	Administers the Register; prompts declarations; supports records.
All staff, associates, contractors and resellers	Comply with this policy; declare gifts and hospitality within limits; refuse improper payments; raise concerns promptly.

13. Breach of This Policy

Breach of this policy is a serious matter. Staff and associates face action under the Staff Disciplinary and Sanctions Policy, up to and including dismissal. Resellers face suspension or termination under the Reseller Policy and Agreement. In addition, individuals may face personal criminal liability under the Bribery Act 2010; a person convicted of bribery can face an unlimited fine, imprisonment of up to 10 years or both. TTT itself can face an unlimited fine under Section 7 if adequate procedures are not in place.

14. Training and Communication

Audience	Content	Frequency
All staff and associates	Bribery Act overview, prohibited conduct, gifts and hospitality limits, reporting routes	Induction and annual refresh
Centre Manager and higher-risk roles	Risk assessment, due diligence, investigation, international considerations	Annual
Resellers and significant suppliers	Policy overview through onboarding, contract clauses and annual reminders	At onboarding and annually

15. Monitoring and Review

This policy is reviewed annually by the Centre Manager as part of TTT's self-evaluation process. Interim reviews are triggered by changes to the Bribery Act or Ministry of Justice guidance, a significant incident or a change in TTT's risk profile (for example, new international activity). All outcomes are recorded in the Version History at Section 17.

16. Related Documents

This policy should be read alongside:

- Staff Code of Conduct
- Staff Disciplinary and Sanctions Policy
- Conflict of Interest Policy
- Whistleblowing Policy
- Safer Recruitment Policy
- Malpractice and Maladministration Policy
- Reseller Policy and Agreement
- Data Retention and Disposal Policy

17. Version History

Version	Date	Author	Summary of Changes
1.0	22/04/2026	Phenil Mehta	A new standalone policy aligned with the Bribery Act 2010 and the Ministry of Justice six-principle guidance, covering prohibited conduct, gifts and hospitality thresholds (£25 log / £75 pre-approval), Gifts and Hospitality Register, third-party and reseller due diligence and reporting

Version	Date	Author	Summary of Changes
			routes including Action Fraud and the Alternative Contact.

18. Approval

This policy has been reviewed and approved by the Centre Manager of TTT.

Phenil Mehta

Name

P Mehta

Signature

22/04/2026

Date