

# **Anti-corruption and Bribery Policy**

Mode Training Limited

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[www.modetraining.co.uk](http://www.modetraining.co.uk)



Copies of all MTL policy and procedures may be obtained  
in large print please call 0151 709 4640 for a copy or  
alternatively e mail [admin@modetraining.co.uk](mailto:admin@modetraining.co.uk)

to be read and understood by:

Staff, Students, Employers, Work experience Providers, School Mentors and all relevant  
partners

## Section 1

### Policy Statement of Intent

#### 1.Aims

1.1 This policy has been written in line with definitions and laws bound by The Bribery Act 2010 and ESFA [Policy for Apprenticeship and Traineeship Employers demonstrating High-Risk Behaviours - GOV.UK \(www.gov.uk\)](#) published February 2022

1.2 It is our policy to conduct all of our business in an honest and ethical manner. We take a zero-tolerance approach to bribery and corruption, and we are committed to acting professionally, fairly and with integrity in all our business dealings and relationships wherever we operate and in implementing and enforcing effective systems to counter bribery.

1.3 We will uphold all laws relevant to countering bribery and corruption. However, we remain bound by the laws of the UK, including the Bribery Act 2010.

1.4 The purpose of this policy is to:

- (a) set out MTL responsibilities and of those working for MTL, in observing and upholding our position on bribery and corruption; and
- (b) to provide information and guidance to those working for MTL on how to recognise and deal with bribery and corruption issues.

1.5 In this policy, **third party** means any individual or organisation you come into contact with during the course of your work for MTL, and includes actual and potential learners, employers, work experience providers, suppliers, distributors, business contacts, government and public bodies, including their advisors, representatives and officials, politicians and political parties.

## Section 2

### Definition

#### 2.1 What is bribery?

A bribe is an inducement or reward offered, promised or provided in order to gain any commercial, contractual, regulatory or personal advantage.

#### 2.2 Examples

##### Offering a bribe

You offer a potential placement provider or apprenticeship employer tickets to FA Cup final, but only if they agree to take on an apprentice or do business with us. This would be an offence as you are making the offer to gain a commercial and contractual advantage. We may also be found to have committed an offence because the offer has been made to obtain business for us.

##### Receiving a bribe

A supplier MTL work with gives your son a job but makes it clear that in return they expect you to use your influence at Mode to ensure we continue to do business with them.

It is an offence for a supplier to make such an offer. It would be an offence for you to accept the offer as you would be doing so to gain a personal advantage.

## **2.3 Gifts and hospitality**

This policy does not prohibit normal and appropriate hospitality (given and received) to or from third parties.

The giving or receipt of gifts is not prohibited, if the following requirements are met:

- it is not made with the intention of influencing a third party to obtain or retain business or a business advantage, or to reward the provision or retention of business or a business advantage
- it complies with local law
- gifts should not be offered to or received from, government officials, local councilors, politicians, or political parties without the prior knowledge and authorisation of a Director
- it is appropriate in the circumstances. For example, in the UK it is customary for small gifts to be given at Christmas time.
- taking into account the reason for the gift, it is of an appropriate type and value and given at an appropriate time.

## **2.4 What is Corruption?**

Corruption is the misuse of entrusted power or public office for private gain and is a serious criminal offence. The principle applicable law regarding bribery and corruption is the criminal law in the UK and particularly the Bribery Act 2010.

## **2.4 What is not acceptable?**

It is not acceptable for you (or someone on your behalf) to:

- 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.
- threaten or retaliate against another worker who has refused to commit a bribery offence or who has raised concerns under this policy; or
- engage in any activity that might lead to a breach of this policy

## **Section 3 Organisation**

This policy applies to all individuals working at all levels at MTL including, director, senior managers, employees fixed term, permanent or temporary full or part time, apprentices, volunteers, interns, and any other person deemed as working for MTL

### **Company Director**

- It is the responsibility of Debbie Carney to ensure this policy is adhered to and upheld by all staff and associates of MTL

## Staff responsibilities

- You must ensure that you read, understand, and comply with this policy
- The prevention, detection and reporting of bribery and other forms of corruption are the responsibility of all staff including volunteers. It is everyone's responsibility to avoid any activity that might lead to, or suggest, a breach of this policy
- Any employee who breaches this policy will face disciplinary action, which may result in dismissal. We reserve our right to terminate our contractual relationship with other workers and organisations if they breach this policy
- It is the responsibility of all staff to report any acts or bribery, and this should be reported following procedure in **MTL Whistle Blowing Policy** which is available on MTL website and intranet, copies are also available at the centre in large print if required

## Section 4

### Signatures

This policy was produced by Debbie Carney and Emma Tagoe on behalf of Mode Training Limited.

Signed: 

**Debbie Carney Company Director**

**24<sup>th</sup> September 2024**

Signed: 

**Emma Tagoe Senior Manager Curriculum**

**24<sup>th</sup> September 2024**

### Policy Review

Date of review	Review completed by	Overview of any updates
11/01/2020	Debbie Carney	No changes required
12/05/2021	Debbie Carney	No changes required
18/02/2022	Debbie Carney	Reference made to <a href="#">Policy for Apprenticeship and Traineeship Employers demonstrating High-Risk Behaviours - GOV.UK (www.gov.uk)</a> at 1.1  Definition of corruption added at 2.4
03/02/2023	Debbie Carney	No changes required
01/05/2024	Debbie Carney	Emma Sinnett surname changed to Tagoe No other changes required
21/09/2024	Emma Tagoe	Policy fit for purpose no changes required
24/09/2025	Debbie Carney	Emma Tagoe job role changed to Centre Manager