

ANTI-BRIBERY AND CORRUPTION POLICY

Compliance with Bribery Act 2010

Ignition Pro - School for Entrepreneurs Limited

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1. POLICY STATEMENT

Ignition Pro - School for Entrepreneurs Limited operates with zero tolerance for bribery and corruption in any form. The institution is committed to conducting all business and educational activities with integrity, transparency, and in compliance with the Bribery Act 2010, Office for Students ongoing registration condition E8, and all applicable anti-corruption legislation.

This policy prohibits offering, promising, giving, accepting, or soliciting any advantage as an inducement for action which is illegal, unethical, or a breach of trust. Bribery is a criminal offense that can result in unlimited fines and imprisonment for individuals, and unlimited fines and serious reputational damage for the institution. It is also a form of prohibited conduct under OfS Condition E8.2(b) that could result in sanctions including deregistration.

The institution expects all staff, students, governors, contractors, and associates to maintain the highest standards of ethical conduct and to report any suspicions of bribery through appropriate channels. All reports will be treated seriously and investigated thoroughly. Individuals who engage in bribery will face disciplinary action up to and including dismissal, criminal prosecution, and civil recovery proceedings.

2. SCOPE AND APPLICATION

This policy applies to all individuals associated with the institution regardless of location, including all employees (permanent, fixed-term, part-time, casual), agency workers and temporary staff, contractors and consultants, volunteers and adjunct faculty, Board members and governors, students, and any person or organization acting on behalf of the institution.

The policy applies to all activities conducted on behalf of the institution, including student recruitment and enrollment, delivery of education and assessment, procurement and purchasing decisions, financial transactions and fund management, regulatory reporting and compliance, relationships with government officials and public bodies, partnerships and collaborative arrangements, and research and consultancy activities.

3. LEGAL AND REGULATORY FRAMEWORK

3.1 Bribery Act 2010

The Bribery Act 2010 creates four principal offenses: Offering, promising, or giving a bribe (active bribery - Section 1), Requesting, agreeing to receive, or accepting a bribe (passive bribery - Section 2), Bribing a foreign public official (Section 6), and Failure of a commercial organization to prevent bribery (Section 7). Individuals convicted of bribery offenses face up to 10 years imprisonment and unlimited fines. The institution can be held liable for bribery committed by employees or associated persons unless it can demonstrate adequate procedures to prevent bribery.

3.2 OfS Condition E8

Office for Students ongoing registration condition E8 requires registered providers to have adequate and effective management and governance arrangements to prevent, detect, investigate, and stop all forms of prohibited conduct, including bribery and corruption. Bribery and corruption are explicitly identified in E8.2(b) as forms of prohibited conduct that institutions must prevent and detect. Failure to comply with condition E8 may result in monetary penalties, suspension of registration, or deregistration, which would terminate student access to Student Loans Company funding.

4. WHAT CONSTITUTES BRIBERY AND CORRUPTION

4.1 Bribery Defined

Bribery is the offering, promising, giving, accepting, or soliciting of an advantage (financial or otherwise) as an inducement for action which is illegal, unethical, or a breach of trust. A bribe can take many forms including cash payments, gifts of significant value, excessive hospitality or entertainment, loans or guarantees, favors or preferential treatment, employment opportunities or contracts, political or charitable donations used as a cover for bribes, or any other advantage intended to improperly influence decisions.

4.2 Examples of Prohibited Conduct

The following are examples of conduct that would constitute bribery and are strictly prohibited:

- Accepting payment from a student or agent in exchange for falsifying enrollment or attendance records to facilitate improper access to Student Loans Company funding
- Offering a payment or benefit to a regulatory official to secure favorable treatment in quality assessments or compliance reviews
- Accepting gifts or hospitality from a supplier in exchange for awarding contracts without proper competitive tendering
- Offering inducements to external examiners or quality assessors to overlook deficiencies or provide favorable reports
- Accepting kickbacks from recruitment agents in exchange for enrolling students who do not meet admission criteria
- Making facilitation payments (small bribes to secure routine services) even if common practice in certain contexts - these remain illegal under UK law
- Channeling benefits through intermediaries or third parties to conceal bribery

4.3 Corruption Defined

Corruption is the abuse of entrusted power for private gain. It includes bribery but extends to other forms of dishonest or fraudulent conduct by those in positions of authority, such as embezzlement, nepotism, extortion, influence peddling, and conflicts of interest that are not properly managed.

5. GIFTS, HOSPITALITY, AND ENTERTAINMENT

Legitimate business hospitality and modest gifts that build relationships and goodwill are acceptable provided they are reasonable, proportionate, transparent, and not intended to influence improperly. However, gifts and hospitality must be carefully managed to avoid creating actual or perceived conflicts of interest or bribery risks.

5.1 Acceptable Gifts and Hospitality

The following are generally acceptable provided they meet the criteria below:

- Token gifts of nominal value (under £25) such as branded promotional items, calendars, diaries
- Modest hospitality such as working meals or refreshments during business meetings
- Attendance at professional events, conferences, or seminars where there is clear business benefit
- Occasional meals or entertainment of reasonable value in context of developing business relationships

Criteria for acceptable gifts and hospitality: Modest and proportionate to the context, Not cash or cash equivalents, Not offered or received during procurement or contract negotiation, Not creating sense of obligation or expectation of favors, Properly declared in accordance with this policy,

Transparent and able to withstand public scrutiny, Compliant with recipient organization's policies if applicable.

5.2 Unacceptable Gifts and Hospitality

The following are never acceptable and must be refused:

- Cash or cash equivalents (gift cards, vouchers, etc.)
- Gifts or hospitality offered with explicit or implicit expectation of favorable treatment
- Lavish or extravagant gifts or entertainment disproportionate to the business relationship
- Gifts or hospitality to or from students that could affect assessment or academic decisions
- Gifts or hospitality to or from regulatory officials or public officers
- Gifts or hospitality during procurement processes or contract negotiations
- Frequent gifts or hospitality creating sense of obligation

5.3 Declaration Requirements

All gifts or hospitality with a value of £25 or more (whether offered or received) must be declared to the Chief Executive Officer within 5 working days using the Gifts and Hospitality Declaration Form. The CEO will maintain a Gifts and Hospitality Register recording all declarations. The register will be reviewed quarterly by the Board to identify any patterns of concern.

If you are uncertain whether to accept a gift or hospitality, you should consult the CEO before accepting. When in doubt, decline politely and explain the institution's policy.

6. SPECIFIC HIGH-RISK SCENARIOS

6.1 Student Recruitment and Enrollment

Staff involved in student recruitment and enrollment must never accept payments, gifts, or benefits from students, applicants, or third parties (including agents, family members, or sponsors) that could influence enrollment decisions or facilitate improper access to Student Loans Company funding. All students must meet published admission criteria and genuine enrollment requirements. Enrollment staff must not falsify enrollment records or attendance data regardless of any inducement offered. The institution does not operate agent-based recruitment, eliminating commission-based incentives that create bribery risks.

6.2 Dealings with Public Officials and Regulators

Particular care must be taken in all dealings with public officials including Office for Students staff, Quality Assurance Agency reviewers, Pearson BTEC validators, Student Loans Company representatives, local authority officials, and government departments. No gifts, hospitality, or benefits may be offered to public officials without prior CEO approval. Even modest hospitality such as working meals must be transparent, properly recorded, and proportionate. Staff must never attempt to improperly influence regulatory decisions, quality assessments, or compliance reviews through any form of inducement.

6.3 Procurement and Supplier Relationships

All procurement decisions must be based on merit, value for money, and compliance with procurement procedures. Staff involved in purchasing must not accept gifts or hospitality from suppliers during procurement processes or contract negotiations. Suppliers who offer inappropriate gifts or inducements should be reported to the CEO and may be excluded from future procurement. Personal relationships with suppliers must be declared and managed through appropriate conflict of interest procedures.

6.4 Assessment and Academic Integrity

Staff involved in assessment or academic decision-making must never accept gifts or benefits from students that could create actual or perceived bias in assessment or academic progression decisions. Student gifts at the end of a programme (such as flowers or chocolates) may be accepted provided they are of token value and shared with the teaching team. Cash or valuable gifts must always be refused. Any offer of a gift or benefit that appears intended to influence academic decisions must be reported immediately to the CEO.

7. RESPONSIBILITIES

7.1 Board of Directors

The Board is responsible for approving and overseeing this policy, ensuring adequate resources and systems are in place to prevent bribery, reviewing reports on gifts and hospitality and any suspected bribery cases, and promoting a culture of integrity and ethical conduct throughout the institution.

7.2 Chief Executive Officer

The CEO is responsible for implementing this policy, maintaining the Gifts and Hospitality Register, investigating suspected bribery, ensuring staff training and awareness, reporting to the Board and regulators as required, and taking disciplinary action where appropriate.

7.3 All Staff and Associates

All individuals associated with the institution must comply with this policy, complete mandatory anti-bribery training, declare gifts and hospitality as required, report suspected bribery through appropriate channels, and cooperate fully with any investigations.

8. REPORTING SUSPECTED BRIBERY

The institution encourages all individuals to report suspected bribery through the channels established in the Whistleblowing Policy. Reports may be made to your line manager (who must escalate to CEO), the Chief Executive Officer directly (ceo@ignition-pro.com), the Board Chair if concern relates to CEO (chair@ignition-pro.com), or the Office for Students whistleblowing channel (whistleblowing@officeforstudents.org.uk).

All reports will be treated confidentially and investigated thoroughly. You will be protected from retaliation for raising genuine concerns in good faith. Anonymous reports will be accepted though they may limit investigation effectiveness.

9. INVESTIGATION AND CONSEQUENCES

All suspected bribery will be investigated promptly and thoroughly. Investigations may involve interviews, document review, forensic analysis, and engagement of external specialists. Individuals under investigation will be given opportunity to respond to allegations in accordance with natural justice principles.

Bribery is a serious criminal offense and a gross breach of trust. Consequences for individuals engaging in bribery include summary dismissal for gross misconduct, referral to police for criminal prosecution (individuals face up to 10 years imprisonment), civil recovery of losses, professional misconduct proceedings where applicable, and termination of contracts for contractors/consultants.

The institution will report substantiated bribery cases to the Office for Students, Student Loans Company if relevant public funds are affected, and police and other law enforcement agencies as appropriate. The institution will cooperate fully with external investigations and prosecutions.

10. TRAINING AND AWARENESS

All staff will receive anti-bribery training during induction covering what constitutes bribery, the Bribery Act 2010 and OfS requirements, acceptable and unacceptable gifts and hospitality, how to recognize and report bribery, and consequences of non-compliance. Annual refresher training is mandatory. Staff in high-risk roles (recruitment, procurement, finance) receive enhanced training.

This policy will be published on the institutional website and intranet. Students, contractors, and suppliers will be made aware of the institution's zero tolerance approach to bribery.

11. POLICY REVIEW

This policy will be reviewed annually by the Board to ensure continued effectiveness and compliance with legal and regulatory requirements. The review will consider bribery risk assessments, effectiveness of preventive measures, any incidents or near-misses, training completion rates, gifts and hospitality patterns, changes in legislation or regulatory guidance, and sector best practice.

12. KEY CONTACTS

Role	Contact Information
Chief Executive Officer	ceo@ignition-pro.com
Board Chair	chair@ignition-pro.com
OfS Whistleblowing Channel	whistleblowing@officeforstudents.org.uk
Serious Fraud Office	0800 096 0762 www.sfo.gov.uk

This Anti-Bribery and Corruption Policy has been approved by the Board of Governors and is effective from October 2025.