Anti Bribery and Corruption Policy

Document Control		
Document Number:	AIQ-037	**Effective from**: 01-08-2026
Linked Regulatory Requirements:	GCOR C1, G1, G2 and H1	
Version Number and Date:	v1.0, 09-07-2026	**Review date:** 09-07-2026
Date of Next Review:	02-11-2026	**Classification Level:** Public/General

Approval Level: High impact

Approved by: Executives

Date version approved: 09-07-2026

Version Number	Date	Changes
v0.1	11/06/26	Document created
v1.0	09/07/26	Document approved ready for implementation on the 01/08/2026

Contents

1. Policy principles

1.1. Fraud, bribery, and corruption divert money and management attention away from Active IQ core operations and purpose and could threaten Active IQ's reputation.

1.2. Active IQ is committed to high standards of ethical behaviour, acting with integrity, and upholding the law. Acts of fraud, bribery or other corrupt behaviour will not be tolerated in any part of Active IQ's activities, at home or abroad, including where such activities are carried out by third parties acting for or on behalf of Active IQ.

1.3. Where justified, disciplinary and/or legal action will be taken against any individual or group who perpetrates any act constituting fraud against Active IQ and all necessary steps will be taken to recover any losses incurred.

2. Purpose

2.1. The purpose of this policy is to

- Outline our expectations of colleagues of Active IQ and third parties acting on our behalf in observing and upholding our position on bribery and corruption.
- Describe what fraud, bribery and corruption are to help those persons working for and with us to recognise potential occurrences; and
- Provide guidance on how concerns should be raised, investigated, and resolved.

3. Scope

3.1. This Policy applies to:

- All colleagues working for Active IQ, at all levels including Board Members, Executives, directors, officers, agency workers, seconded workers, and interns ('Active IQ colleagues').
- All centres, customers, suppliers, agents, contractors, external consultants, third-party representatives, business partners, sponsors, or any other person associated with Active IQ or performing work on behalf of Active IQ, wherever located ('Active IQ Associated Persons').
- In addition to this policy, the 'Code of Conduct for Trustees' governs the actions of members of the Board of Trustees.

4. Responsibilities/duties

The Chief Finance Officer is the document owner and is responsible for the implementation of this policy.

5. Definitions

Word/Acronym	Definition
CFO	Chief Financial Officer
ARA	Audit, Risk and Assurance

6. Location

6.1. This policy is located on:

Active IQ website for: Centres, customers, stakeholders, 3rd party contractors and suppliers.

7. What is fraud, bribery, and corruption?

7.1. **Fraud** is a broad term used to describe several activities including theft, embezzlement, false accounting, misappropriation, bribery, corruption, deception, and collusion. In general, fraud involves deception to dishonestly make a personal gain and/or create a loss for another party.

7.2. **Bribery** is offering, promising, giving, or accepting any financial or other advantage, to induce the recipient or any other person to act improperly in the performance of their functions, or to reward them for acting improperly, or where the recipient would act improperly by accepting the advantage.

7.3. **Corruption** is the abuse of entrusted power or position for private gain.

7.4. The UK Bribery Act 2010 sets out offences relating to:

- making a bribe
- requesting or accepting a bribe
- bribing foreign public officials (wherever that takes place).

7.5. There is also a corporate offence of 'failing to prevent bribery'. Active IQ must have 'adequate procedures' in place to avoid being convicted of this offence.

7.6. Under the Bribery Act it is a criminal offence to give or receive (or promise to give or receive) a bribe anywhere in the world.

7.7. Bribes usually take the form of improper payments or personal ‘commissions. They can however take on forms such as gift cards, gifts, entertainment and shopping trips, payment or travel and other expenses, secret rebates or charitable or political donations.

7.8. Facilitation payments, which are common in some countries, are also outlawed under the Bribery Act. These payments secure or expedite routine or necessary Government action by a public official.

7.9. Under the Bribery Act, Active IQ is accountable for the actions of any Active IQ Associated Persons who work on its behalf (including international agents and contractors).

7.10. Examples of situations involving fraud and bribery are shown at Appendix A.

8. Active IQ’s position on fraud, bribery, and corruption

8.1. Active IQ will not tolerate fraud, bribery, or any other corrupt activity, carried out by Active IQ colleagues or Active IQ Associated Persons.

8.2. Active IQ will seek to prevent such activity through a variety of measures including:

- strong internal controls to prevent and detect irregularities
- strict recruitment and induction procedures; and
- staff awareness and training.

8.3. Active IQ will encourage its colleagues and Associated Persons to report concerns and suspicious activity (see section 12).

9. Expectations of Active IQ associated persons

9.1 In line with Active IQ’s Centre Agreement, its standard terms of business and/or our contractual terms with you, we expect Active IQ’s Associated Persons (customers and third parties):

- to read and abide by the contents of this policy

- to have dedicated anti-bribery and corruption policies and procedures which can be made available to Active IQ on request

- to fully adhere to your policies and procedures in the identification, minimisation, and mitigation of risks of anti-bribery and corruption

- to adhere to any contractual arrangement, you may have with us in relation to bribery or corruption; and

- to tell us where you have identified an incident of, or a significant risk of, bribery and corruption that may adversely affect Active IQ.

9.2. Failure to comply with this policy and/or your Centre Agreement or Contract with Active IQ may lead to immediate termination of our contract with you.

9.3. Associated Persons should direct risks or instances of bribery or corruption to Active IQ's Director of Planning, Performance and Assurance (ARA) or a member of the Executive team. Contact details are included in this document. Executive member details may be obtained from Active IQ's website.

10. Gifts and hospitality

10.1. The giving and receiving of gifts and hospitality is conductive to good customer and stakeholder relationships and Active IQ encourages gifts and hospitality to be given or received as appropriate in line with customary business practice and this policy.

10.2. Consideration must always be given to our charitable status in the decision to offer or accept gifts and hospitality. As such, the following figures are deemed to be reasonable:

- up to £25 per gift for receiving gifts
- up to £50 per gift for giving gifts
- up to £50 per person for giving or receiving hospitality.

10.3. All cash gifts will be refused. Gifts with a value of less than £25 may be retained by the recipient. All gifts of more than £25 may be accepted but must be given to the Governance team who will include the gift in a raffle for charity.

10.4. Hospitality, also referred to as 'business entertaining' includes meals, entertainment (which includes cultural events, tourist visits etc) transport, accommodation and any other activities that could be interpreted as hospitality.

10.5. The giving of cash as a gift is not permitted. Cash-equivalent gifts (including gift certificates and vouchers) are not appropriate, however, they can on occasion be given as gifts for learners.

10.6. No Active IQ colleague or Associated Person may accept or give and discount, gift or favours that may influence, or be perceived to influence the exercise of their employment function, the performance of their employment duties or their professional judgement.

11. Charitable donations

11.1. Charitable donations, including charitable sponsorships, may customarily be made by some companies to other companies and/or individuals undertaking activities to raise money for charities. Such sponsorships may be interpreted as gifts.

11.2. There must be no risk of the perception of bribery or corruption in charitable giving or receiving by/to Active IQ. Therefore, before proceeding with or accepting charitable donations and/or sponsorships, it is important to consider the examples in Appendix A to evaluate whether a donation to/from Active IQ could be considered as or perceived to be a bribe.

12. Reporting concerns about suspected fraud, bribery, or corruption

12.1. You are encouraged to raise concerns about any issue or suspicion of fraud, bribery, or corruption at the earliest possible stage.

12.2. If you are offered a bribe, or are asked to make one, or if you believe or suspect that any bribery, corruption, or other breach of this policy has occurred or may occur, you must notify the Director of Planning, Performance and Assurance as soon as possible. You may also report it in in confidence (wherever possible) in accordance with our Whistleblowing Policy, a copy of which can be found on the Active IQ external website

12.3. You can contact us by email or telephone:

E: csteam@activeiq.co.uk
T: +44(0)1480 467 950
T: +44(0) 845 688 1278

12.4. Concerns should normally be communicated in writing but may be made orally in exceptional circumstances. The report should include:

- a brief description of the alleged irregularity
- the loss (or potential loss) involved
- the individual(s) involved
- any evidence supporting the concern

12.5. It can be difficult to assess and investigate anonymous allegations. For this reason, anonymous reporting is discouraged but in exceptional circumstances and where supported by evidence, may form the basis of an investigation.

12.6. Individuals who refuse to accept or offer a bribe, or who raise concerns or report another's wrongdoing, are sometimes worried about possible repercussions. We aim to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken.

12.7. **For centre related instances:** the Director of Planning Performance and Assurance will keep a register of all reported concerns, including concerns relating to fraud, bribery, and corruption. The register will include reference to any associated investigations and outcomes and will be kept for at least six years.

13. How Active IQ will respond to concerns

13.1. The Director of Planning, Performance and Assurance is responsible for co-ordinating Active IQ's response to actual or suspected incidents under the scope of this policy.

13.2. Upon notification and initial consideration of a concern, the Director of Planning, Performance and Assurance shall inform the Chief Financial Officer ('CFO') where possible within 24 hours.

13.3. The CFO will consider who will lead the investigation into the concern. Investigations will typically be led by the Director of Planning, Performance and Assurance, but the CFO may determine that it is more appropriate for an Executive team Member or Active IQ's Internal Auditors to lead an investigation ('the Investigating Lead').

13.4. Investigations into suspected fraud, bribery and corruption will be carried out in a fair and impartial way, taking account of relevant guidance issued by the Charity Commission or any other relevant regulatory body.

13.5. The Investigating Lead will ensure that the investigation secures appropriate evidence of any fraud, bribery and corruption and quantifies the amount of any loss to Active IQ.

13.6. On completion of the investigation, the Investigating Lead will produce a written report for the CFO. The report will include the following:

- a conclusion as to whether the reported concern has any substance
- the nature and extent of the fraud or irregularity
- its impact, financial or otherwise, on Active IQ
- who was involved
- internal control weaknesses which may have allowed the irregularity to occur
- recommendations regarding actions required to prevent a recurrence.

13.7. All proven incidents of fraud, bribery and corruption will be reported to the police for possible prosecution. In addition to any criminal prosecution brought by the policy, Active IQ may instigate civil legal proceedings.

14. Initial Equality Impact Assessment

14.1. An Initial Equality Impact Assessment has been completed for this policy, and no concerns were raised.

15. References to associated documents

- Conflict of Interest Policy
- Whistleblowing Policy
- Centre Agreement

16. Implementation and dissemination

- The policy will be implemented immediately upon approval and will be available on Active IQ website

17. Monitoring arrangements

17.1. This policy will be subject to review every three years, or earlier if required due to changing circumstances or other relevant factors.

17.2. Any significant changes to this policy that may affect customers, learners, or other stakeholders will be communicated through the usual channels.

17.3. Policies issued during this period are controlled documents and must be adhered to where specified.

18. Data retention

18.1 Any information gathered, processed or deleted should be held for no longer than five years.

19. Appendices

Appendix A – Fraud examples

Fraud: examples
Deliberate personal gain/benefit because of misuse of NCFE funds and/or activities Falsifying financial statements.
Embezzlement, taking money which, you have been entrusted with on behalf of another party.
Illegal diversion of funds e.g. receiving cash and not recording its receipt Submitting false qualifications, professional registrations and/or references to obtain employment.
Falsifying expense claims e.g. excessive expenses or expenses which are not reflective of actual activities or were never wholly incurred.
Falsely claiming to be off sick
Competing private work during NCFE time
Corporate identify fraud e.g. using NCFE's logo or letterhead for personal reasons and/or to imply NCFE has sanctioned the content of the document.

Bribery: examples
You offer a potential customer tickets to a major sporting event, but only if they agree to do business with us.
This would be an offence as you are making the offer to gain a commercial and contractual advantage. NCFE may also be found to have committed an offence because the offer has been made to obtain business for us. It may also be an offence for the potential customer to accept your offer.
A supplier gives your nephew a job but makes it clear that in return they expect you to use your influence in our organisation 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. Payment of a facilitation payment to a foreign official. The offence of bribing a foreign public official is committed as soon as the offer is made. This is because it is made to gain a business advantage for us. We may also be found to have committed the offence.
Alteration of academic outcomes or awards in return for an inducement.
Alternation of the outputs or findings of work undertaken (e.g. research or consultancy work) in return for an inducement.
Alteration, including destruction, of any documentation or records in return for an inducement.

Accepting gifts and/or hospitality from current or potential suppliers of goods/services during procurement exercises. This could be an attempt to influence NCFE’s actions during the process and should be refused.
Accepting excessive levels of gifts or hospitality knowing that it is intended to influence the outcome of a decision or other outcome.