Bribery and Corruption Policy

V25.1

Bribery and Corruption Policy	
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Policy/Document is for the use of	Learners, Apprentices, Training Providers, Recognised Centres, VQA Employees, Third Parties,
Should be read in conjunction with	Malpractice and Maladministration Policy, Conflicts of Interest Policy

Contents

Introduction 4
VQA Internal Responsibility 4
Review arrangements 4
Definition 4
Commitments 4
Managers/Team Leaders 4
All VQA Staff Members 4
Receiving Gifts 5
The Gifts and Hospitality Register 5
Third Parties 5
Hospitality 5
Investigation into suspected bribery and corruption 6

Introduction

VQA's is committed to conducting its business in an honest, ethical and transparent manner.

In accordance with the guidance accompanying The Bribery Act 2010, VQA has published this policy with the intention of informing all VQA staff, partners and third parties of VQA's commitment to upholding these principles, and what standards it expects of those acting on its behalf.

VQA Internal Responsibility

The Compliance Manager is responsible for the maintenance and compliance of this policy. If the Compliance Manager is absent, the Head of Regulatory Compliance will appoint another appropriate colleague to ensure the policy is maintained.

The Managing Director is responsible for ensuring that this policy complies with our ethical commitments and that VQA's actions and activities are in line with the contents of this policy.

Review arrangements

We will review the policy as part of our annual self-evaluation process and revise it when necessary in response to feedback, trends from our internal monitoring arrangements, changes in our practices, actions from the regulatory authorities or external agencies, or changes in legislation.

The annual review of this policy will be undertaken by the Regulatory Compliance pillar. Any amendments or updates to this policy will be approved by VQA's Leadership Team.

Definition

For the purposes of this policy, VQA has adopted the definition used by The Bribery Act 2010, defining bribery generally as giving someone a financial or other advantage to encourage that person to perform their functions or activities improperly or to reward that person for having already done so.

Commitments

VQA has no tolerance of bribery or corruption in any form and is committed to ensuring no such instances occur, accepting that it is not only illegal, but contrary to VQA's fundamental values as an organisation.

VQA considers the elimination of bribery and corruption as vital to ensuring trust in our own organisation and public confidence in qualifications in general. It is of paramount importance that we comply with the contents of this policy.

Managers/Team Leaders

As identified in the Government guidance on the Act and the procedures organisations can put in place to prevent bribery, managers and team leaders are in the best position to ensure their organisation conducts business without bribery. All VQA managers and team leaders are responsible for ensuring this policy is understood and complied with by colleagues, and for monitoring the activities of those they are managing.

All VQA Staff Members

VQA staff members (including third parties acting on behalf of VQA) must not accept any gift that could be perceived to influence any decision or activity which is part of their employment functions. If there is any doubt as to whether a particular circumstance presents such a risk, in

protection of the individual and the business, a member of the Leadership Team must be made aware of the details of the gift.

Receiving Gifts

A gift may be retained by the recipient only if it satisfies all of the following criteria:

- It is not cash or a cash equivalent (such as gift certificates or vouchers)
- It is of a value of less than £25
- It is not made with the intention of influencing a decision, or to give a reward for having done so
- It is given openly, not secretly
- It is appropriate in the circumstances, for example, the giving of small gifts at Christmas.

VQA accepts that there may be exceptional circumstances where refusing a gift will cause significant offence or embarrassment. In such instances, the gift may be accepted and subsequently shared amongst VQA staff or donated to a charity of the company's choice to be administered by the Leadership Team.

The Gifts and Hospitality Register

The Leadership Team will administer and maintain a Gifts and Hospitality Register, which documents all gifts and hospitality received by or offered to VQA staff and third parties acting on its behalf.

All VQA staff and third parties acting on its behalf must inform a member of the Leadership Team whenever they accept or are offered a gift or hospitality.

The Gifts and Hospitality Register will be regularly reviewed by the Leadership Team.

Third Parties

Certain operations by VQA involve the use of third parties. Under the Bribery Act 2010, an organisation may be liable for the activities of any individual who 'performs services' for or on behalf of an organisation. As such, it is VQA's position that all third parties acting on its behalf abide by the contents of this policy.

For that to be true it is vital that all third parties:

- Have read and understood the contents of this policy;
- Have not previously been involved in any corrupt activity;
- Are aware of who they must contact if they are unsure of whether a particular circumstance would fall under the scope of this policy.

Hospitality

This policy does not prohibit normal and appropriate hospitality for the purpose of establishing, maintaining or improving business relationships or VQA's reputation or image. For the purposes of this policy, Hospitality is defined as any form of accommodation, entertainment or reception that is more than an incidental kind, such as a beverage or light refreshment provided for an employee of VQA (including third parties acting as a representative of VQA).

As with a gift of any kind, it is vital that the hospitality not be offered or given with the intention of inducing the person to perform a relevant function improperly, and if there is any doubt as to whether a particular circumstance presents such a risk, in protection of the individual and the business, a member of the Leadership Team must be made aware of the details of the hospitality offered.

Investigation into suspected bribery and corruption

Any suspected act of bribery and corruption reported to VQA will be investigated as an act of malpractice in line with our Malpractice and Maladministration Policy, within which documented guidance on our investigation processes can be found.

The Malpractice and Maladministration Policy also indicates how any potential whistleblower or informant can go about instigating an investigation into a suspected act of bribery or corruption, including those relating to a VQA Recognised Centre. It is also to be used by VQA staff members to ensure they deal with any investigations into bribery and corruption in a consistent manner.

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