TaylorITEX CIC
ANTI-BRIBERY POLICY

Version 4 • August 2026

Honest • Transparent • Zero Tolerance

Section 1 – Document Control

Document Information

Document Title	Anti-Bribery Policy
Organisation	TaylorITEX CIC
Document Owner	Executive Director – Michael Taylor
Responsible Officer	Executive Director – Michael Taylor
Version	4
Effective Date	August 2026
Review Date	July 2027
Review Frequency	Annually, or sooner where legal, contractual or organisational requirements change
Policy Status	Approved
Applies To	Directors, employees, tutors, volunteers, learners, contractors, partners and anyone acting on behalf of TaylorITEX CIC

Version History

Version	Date	Author	Summary of Changes
3	3 September 2025	TaylorITEX CIC	Previous approved Anti-Bribery Policy
4	August 2026	TaylorITEX CIC	Streamlined and strengthened. Updated responsibilities, gifts and hospitality, facilitation payments, third-party controls, reporting and record-keeping.

Policy Approval

This policy has been approved by the Directors of TaylorITEX CIC and forms part of the organisation's governance framework. The latest approved version will replace all previous versions.

Section 2 – Purpose & Commitment

2.1 Zero Tolerance

TaylorITEX CIC has zero tolerance for bribery and corruption. We are committed to conducting our activities honestly, fairly and transparently and to complying with the Bribery Act 2010 and other applicable legal and contractual requirements.

No person acting for or on behalf of TaylorITEX CIC may offer, promise, give, request or accept a bribe or other improper advantage.

Section 3 – Bribery & Corruption

3.1 Bribery

Bribery is offering, promising, giving, requesting or accepting a financial or other advantage with the intention of inducing or rewarding improper performance. A bribe can involve money, gifts, hospitality, favours, services or promises of future benefit. It can be unlawful even where the offer is refused.

3.2 Corruption

Corruption is the abuse of entrusted power or position for improper or personal gain. This includes participating in corrupt activity or knowingly ignoring serious corrupt behaviour.

Section 4 – Gifts, Hospitality & Expenses

4.1 What May Be Acceptable

Reasonable and proportionate gifts or hospitality may be accepted or offered where there is a genuine business purpose, no intention to influence a decision, and the arrangement is transparent. Examples may include low-value promotional items, modest working meals or reimbursement of genuine agreed business expenses.

4.2 Controls

- Cash, cash-equivalents and personal vouchers must never be offered or accepted.
- Gifts or hospitality must not be linked to a current or future tender, contract, funding decision, referral or other business decision.
- Anything more than trivial or routine hospitality must be declared to and approved by the Executive Director before acceptance or offer wherever practicable.
- Relevant gifts and hospitality must be recorded in the Gifts and Hospitality Register.
- Expenses must be genuine, accurately described and supported by appropriate evidence or receipts.

Section 5 – Prohibited Conduct

The following are prohibited:

- Offering, giving, requesting or accepting a bribe or kickback.
- Making or accepting facilitation payments intended to secure or speed up a routine action.
- Offering an improper advantage to a public official, political representative or other person.
- Using a third party, agent, contractor or partner to do something that TaylorITEX CIC could not lawfully do itself.
- Creating false, misleading, incomplete or off-the-record accounts, invoices, expenses or payment records.
- Retaliating against anyone who refuses to participate in bribery or raises a genuine concern.

Section 6 – Third Parties & Due Diligence

TaylorITEX CIC will take proportionate steps to understand the integrity and suitability of contractors, partners, suppliers, agents or other third parties where bribery risk may arise.

Contracts or working arrangements should make expectations clear where appropriate. Unusual payment requests, unexplained commissions, excessive hospitality, requests for cash, or reluctance to provide normal business information must be treated as warning signs and referred to the Executive Director.

Section 7 – Reporting Concerns

7.1 Speak Up

Any person who knows of or reasonably suspects bribery, corruption or attempted bribery connected with TaylorITEX CIC should report the concern promptly to the Executive Director or a Director.

Concerns may also be raised under the TaylorITEX CIC Whistleblowing Policy where applicable. TaylorITEX CIC will support people who refuse to participate in bribery or raise genuine concerns in good faith. Victimisation or retaliation will not be tolerated.

Section 8 – Responsibilities & Records

8.1 Responsibilities

The Directors have overall responsibility for ensuring appropriate anti-bribery arrangements are maintained. The Executive Director is responsible for implementation, advice, relevant registers and proportionate monitoring.

Everyone covered by this policy must act honestly, follow this policy, declare relevant gifts or hospitality, maintain accurate records and report concerns.

8.2 Record-Keeping

TaylorITEX CIC will maintain appropriate financial, contractual and Gifts and Hospitality records. Transactions must be accurately recorded and capable of reasonable scrutiny. Records must not be falsified, concealed or deliberately incomplete.

Section 9 – Breaches & Review

9.1 Consequences

Breaches will be treated seriously and may result in disciplinary action up to dismissal, withdrawal of learner services, termination of contracts or working arrangements, recovery action, or referral to relevant authorities. Criminal conduct may result in investigation or prosecution.

9.2 Review

This policy will be reviewed annually, or sooner where changes in law, guidance, contractual requirements, organisational activity or identified risk require it.

Never offer • Never accept • Always report

Michael Taylor
Executive Director
TaylorITEX CIC