



## People Dancing Professional Qualifications Anti-Bribery Policy

### Introduction

Since the 1st July 2011, the Bribery Act 2010 has brought into force criminal offences for offering or accepting bribes, for which both individuals and companies can be prosecuted. This policy sets out the responsibility of all individuals working on behalf of People Dancing to ensure that no individual uses their knowledge or position for personal gain in a way that might reasonably be seen to compromise People Dancing's integrity or the integrity of the qualifications that we offer.

### To whom does the policy apply?

This policy applies to all individuals working for or providing services to People Dancing (including employees, assessors, contractors and third-party service providers). It also applies to organisations acting on People Dancing's behalf or providing services for the organisation (eg Registered Centres, suppliers).

### What is bribery?

A person is guilty of the offence of bribery if they offer, promise, give, request, agree, receive or accept a financial or other advantage that improperly alters the performance of function or activity.

Bribery is designed to make a person act improperly to secure an advantage to the giver or to someone whom they represent.

### Examples of bribery

- An individual offers to pay twice the stated assessment fee in order to be allocated a particular assessor.
- An assessor is sent a gift of first class train tickets as an inducement to travel to see the work of a company that plans to start offering courses leading to People Dancing Professional Qualifications.
- A website design company offers to create a free website for a People Dancing employee with the expectation that they will then be awarded the contract for creating the People Dancing website.

**Indicators of bribery include:**

- **Secretive behaviour:** for example, they might wish to have exclusive and unobserved communication with a supplier, client, candidate, organisation or individual
- **Abnormal payments:** for example, payments might be made in unusual ways or unexpected amounts might appear without explanation
- **Lack of transparency in decision-making:** for example, decisions are made for which there is no clear rationale or record
- **Processes are bypassed:** those usually involved in processes are discouraged or prohibited from getting involved.

**Action to take if you have any concerns:**

If you suspect bribery is occurring you should:

- Make a written note of your concerns as soon as they come to your attention. Include the following information in your note: names of people involved, date and time of incidents, nature of your concern
- Report your concern immediately to the Executive Director (or the Chair of the Board in her absence).

Issues to be aware of:

**Hospitality**

Hospitality may be offered as a genuine part of business activity providing that it is “reasonable and proportionate” which is part of activity that seeks to improve the image of the organisation, better presents its products or services, or establishes cordial relationships. A business lunch, for example, would therefore be acceptable providing that the invitation is limited to the person the organisation does business with (and not, for example, their friends and family).

**Gifts**

Gifts are not likely to come under scrutiny providing that the recipient would be able to purchase the item themselves from their own resources reasonably routinely and the recipient does not feel that acceptance of the item would compromise their position or activities. Gifts falling outside of this description are not permitted. Cash gifts should never be given or received.

**Social invitations**

Tickets to events or opportunities that are unconnected with People Dancing’s business should not be accepted eg tickets to sporting events or concerts. Events which may have a genuine relationship to People Dancing’s business in the participatory arts may be accepted providing the rationale for attendance can be clearly justified in advance.

**‘Facilitation’ (or ‘grease’) payments**

These are usually small amounts of money that are given to officials for services that would usually be delivered for free but which may be requested to ‘speed up’ the process. In some countries these are considered by some to be ‘normal practice’. However they are illegal under UK law.

## **Donations**

Bribes can be disguised as 'donations', either to charities or political organisations that the recipient is known to support. These must not be encouraged or accepted.

If you are unsure or have concerns about any of the issues listed above please talk to the Executive Director to gain clarification. People Dancing will:

- Make it clear to all employees, contractors and suppliers that it will not tolerate any form of bribery
- Publicise this anti-bribery policy
- Undertake a bribery risk assessment in relation to new activities and conduct due diligence tests in relation to major partners or suppliers
- Encourage openness and accountability amongst all its staff, contractors, suppliers and partners
- Maintain and publish a record of any incidents where bribery is confirmed
- Review the record of incidents and this policy on an annual basis.