



## **ASE Anti Corruption and Bribery Policy**

### **1. Policy statement**

The Association for Science Education (ASE) adopts a zero-tolerance approach to bribery and corruption. In line with our Code of Professional Conduct, the Association for Science Education requires its Trustees, staff and other persons who provide or perform a service for or on behalf of the ASE, to act with honesty and integrity and to safeguard the resources and reputation of the ASE. ASE is committed to safeguarding its resources and reputation and to ensuring its operations are conducted transparently.

The ASE upholds the six principles of bribery prevention as outlined in HM Government guidance: proportionality, top-level commitment, risk assessment, due diligence, communication (including training), and monitoring and review. ASE takes a proportionate, risk-based approach appropriate to the size and nature of the organisation.

The ASE condemns all acts of bribery or corruption; any cases brought to its attention will be dealt with swiftly and in line with disciplinary procedures.

The ASE will uphold all laws relevant to countering bribery and corruption in all the jurisdictions in which it operates, including, in the UK, the Bribery Act 2010, which applies to conduct both in the UK and abroad.

### **2. Definition and Scope**

Bribery is defined as offering, promising, giving, requesting, or accepting any undue advantage—financial or otherwise—with the intention of inducing or rewarding improper performance of a function or activity. It does not need to involve cash and can include any gift, favour, or benefit.

The Bribery Act 2010 provides for 4 bribery offences:

- Bribing: offering, promising or giving an advantage;
- Being bribed: requesting, agreeing to or accepting an advantage;
- Bribing a foreign official;
- Failing, as an organisation, to prevent any person who performs services on its behalf from committing an act of bribery.

This Policy applies to all ASE activities and operations and to all of its dealings and negotiations with third parties in all countries in it operates and extends toll Trustees, staff, and other persons who provide or perform a service for or on behalf of the ASE.

### **3. Gifts and hospitality**

The ASE recognises that acceptable business practice varies across cultures. However, gifts or hospitality must always be reasonable, proportionate, and not intended to influence decisions improperly.

It is not acceptable to:

- give, promise to give, or offer, a payment, gift or hospitality with the expectation or hope that they or the ASE will improperly be given a business advantage, or as a reward for a business advantage already improperly given;
- accept a payment, gift or hospitality from a Third Party where it is known or suspected that it is offered or provided with an expectation that a business advantage will be improperly provided by the ASE in return;
- threaten or retaliate against another person who has refused to commit a bribery offence or who has raised concerns under this policy; or
- engage in any activity that might lead to a breach of this policy.

Gifts or hospitality exceeding £25 in value must be declared and recorded in the ASE Gifts and Hospitality Register.

#### **4. Facilitation payments and “kickbacks”**

ASE does not permit facilitation payments or “kickbacks” of any kind, such as small, unofficial payments made to secure or expedite a routine government action by a government official, or payments made in return for a business favour or advantage. These are illegal under UK law.

#### **5. Charitable Donations and Sponsorship**

The ASE only accepts charitable donations and sponsorship that are ethical and legal under local laws and practices. Donations must not be made or accepted with the intent to influence a decision or outcome.

Due diligence is undertaken on donors and sponsors to manage risks of bribery, reputational damage, or undue influence.

#### **6. Financial Controls and Record keeping**

The ASE maintains accurate financial records and have appropriate internal controls in place which evidence the business reason for gifts, hospitality and payments made and received. All transactions, including gifts, hospitality, and payments, must have a legitimate business purpose and be recorded transparently.

Records are retained in accordance with ASE’s data retention and disposal policy.

#### **7. Responsibilities and raising concerns**

The prevention, detection and reporting of bribery and other forms of corruption are the responsibility of all Trustees, staff and others who provide a service for or on behalf of the ASE. All such individuals are required to avoid any activity that might lead to, or suggest, a breach of this policy.

## 8. Reporting and Whistleblowing

Concerns or suspicions about potential breaches of this policy should be reported to the Chief Executive or Director of Finance and Operations. If this is not appropriate, individuals may contact the Chair of Trustees

Any employee who breaches this policy may face disciplinary action, which could result in dismissal for gross misconduct. We reserve our right to terminate our contractual relationship with non-employee workers if they breach this policy.

## 9. Training and Communication

This policy is shared with all new Trustees, staff, and relevant third parties as part of induction. Periodic reminders or updates will be issued as appropriate.

## 10. Monitoring and Review

This policy will be reviewed every two years or sooner if there are changes in legislation, regulatory guidance, or ASE's risk profile.

### References

1. The six principles of bribery prevention can be found here:  
<https://www.gov.uk/government/publications/bribery-act-2010-guidance>

### Monitoring and Review

Created	July 2021	Approved by Trustees. Developed as requirement for Inclusion Project
Updated	July 2023	Updated – small changes and edits
Updated	July 2025	Clarifications on language. More detail on the 6 principles of bribery prevention. Additional paragraph on training and communication. Updated links
Next Due for Update	July 2027	