

**Anti Corruption and Bribery Policy**

1. **Policy statement**

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.

The ASE is committed to ensuring that its operations are conducted in an open and transparent manner and will adhere to the six principles of bribery prevention1 outlined in the Government’s guidance; and it will take a proportionate and risk based approach to address the risks of bribery and corruption.

The ASE condemns all acts of bribery or corruption; any cases brought to its attention will be investigated exhaustively and dealt with appropriately.

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.

1. **Definition and Scope**

Bribery is commonly described as the, offer, or, acceptance of a reward to persuade another to act dishonestly and or in breach of the law.

It includes the offering, promising, giving, receiving or soliciting of a financial, academic or other advantage or favour as a means of influencing the actions of an individual (or individuals).

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 extends to all ASE activities and operations and to all of its dealings and negotiations with third parties in all countries in it operates. All Trustees, staff, and other persons who provide or perform a service for or on behalf of the ASE are required to comply with this policy.

1. **Gifts and hospitality**

The ASE appreciates that the practice of giving business gifts and hospitality varies between countries and regions and what may be normal and acceptable in one region may not be in another. The test to be applied is whether in all the circumstances the gift or hospitality is reasonable and justifiable both in the UK and any other relevant country. The intention behind the gift should always be considered. 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.

Facilitation payments and “kickbacks”

* We do not make, and will not accept, 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.
1. **Charitable Donations and Sponsorship**
2. The ASE only accepts charitable donations and sponsorship that are ethical and legal under local laws and practices**Record keeping**

We keep appropriate financial records and have appropriate internal controls in place which evidence the business reason for gifts, hospitality and payments made and received.

1. **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.

Trustees and staff are required to notify the Chief Executive or Director of Finance and Operations as soon as possible if it is believed or suspected that a conflict with this policy has occurred, or may occur in the future, or if they are offered a bribe, are asked to make one, suspect that this may happen in the future, or believe that they are a victim of another form of unlawful activity.

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.

If any Third Party is aware of any activity by any Trustee, employee or worker which might lead to, or suggest, a breach of this policy, they should raise their concerns with the Director of Finance and Operations, at laurarafferty@ase.org.uk, or the Chief Executive, Lynn Ladbrook, at lynnladbrook@ase.org.uk

References

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

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