ANTI-BRIBERY AND ANTI-CORRUPTION POLICY

Policy Owner: Head Office - Quality, Standards & Compliance
Oversight Committee: Examinations & Standards Committee
Approval Body: Grand Council
Applies to: All staff, examiners, Artistic Directors, committee members, contractors, consultants, agents, centres and anyone acting on behalf of I-PATH
Review Cycle: Annual, or following regulatory or operational change

1. Purpose

This policy sets out how International Performing Arts & Theatre Limited (I-PATH) prevents, detects and responds to bribery and corruption in all aspects of its activity.

It ensures that:

- decisions relating to qualifications, assessment, examination and certification are made independently and objectively
- public confidence in I-PATH qualifications is protected
- I-PATH complies with its legal obligations under the Bribery Act 2010
- I-PATH meets Ofqual expectations relating to governance, integrity, conflicts of interest and control of standards

Bribery or corruption in any form is incompatible with I-PATH's role as an awarding and examining body.

2. Scope

This policy applies to:

- all employees and office holders
- all examiners and assessors
- Artistic Directors and Artistic Committee members
- members of the Examinations & Standards Committee and Grand Council
- consultants, contractors, agents and representatives
- any individual or organisation acting on behalf of I-PATH, in the UK or internationally

All individuals within scope are required to comply with this policy as a condition of their engagement.

3. Legal and Regulatory Framework

I-PATH operates globally but conducts all business in accordance with English law, including the Bribery Act 2010, regardless of local custom or practice.

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In addition, I-PATH recognises that bribery and corruption pose a direct risk to assessment integrity, which is a core regulatory concern under the Ofqual General Conditions of Recognition.

4. Definitions

For the purposes of this policy:

- **Bribery** means offering, giving, requesting or receiving anything of value to influence a decision or outcome improperly.
- **Corruption** includes abuse of position, conflicts of interest, undue influence, or any action that compromises impartiality, integrity or trust.

5. Core Principles

I-PATH operates on the following principles:

1. Zero tolerance of bribery or corruption
2. Independence of assessment and examination decisions
3. Transparency and accountability in decision-making
4. Separation of commercial, operational and assessment functions
5. Clear reporting and escalation routes

6. Prohibited Conduct

The following activities are strictly prohibited:

- offering, promising, giving or accepting bribes of any value
- attempting to influence examination results, certification decisions or assessment outcomes
- offering or accepting inducements linked to:
    - examiner appointment or allocation
    - grades, marks or outcomes
    - approval of centres or teachers
    - qualification development or approval
- appointing or retaining a third party where there is knowledge or reasonable suspicion of corrupt conduct
- making facilitation payments or unofficial payments in any jurisdiction
- disguising bribes as consultancy fees, gifts, donations or hospitality

Any attempt to interfere with assessment integrity will be treated as serious malpractice.

7. Gifts, Hospitality and Entertainment

7.1 General Expectations

All individuals acting on behalf of I-PATH must conduct themselves with integrity and avoid situations that could give rise to actual or perceived conflicts of interest.

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Gifts or hospitality must never be used to influence, or appear to influence, decisions.

7.2 Acceptable Gifts

- Modest, infrequent gifts of nominal value (not exceeding £100) may be accepted where:
  - there is no expectation of reciprocity
  - the gift is not connected to assessment, approval or regulatory decisions
  - acceptance would not reasonably be perceived as improper

7.3 Prohibited Gifts and Hospitality

The following are not permitted:

- gifts or hospitality offered during:
  - assessment periods
  - examiner allocation or marking
  - centre approval or review
  - qualification development or approval
- cash or cash-equivalent gifts
- travel or accommodation not directly related to legitimate I-PATH business
- hospitality that could reasonably be seen as an inducement

7.4 Gift Register and Declarations

- Gifts above the nominal threshold must be declined where possible
- Where refusal is not practical, the gift must:
  - be declared immediately
  - recorded in the Gift and Hospitality Register
  - surrendered to I-PATH for appropriate handling

8. Conflicts of Interest

All individuals covered by this policy must:

- declare actual, potential or perceived conflicts of interest
- refrain from participating in decisions where a conflict exists
- comply with I-PATH's Conflicts of Interest arrangements

Failure to declare a conflict may constitute misconduct.

9. Due Diligence and Third Parties

I-PATH undertakes proportionate due diligence when:

- appointing suppliers or contractors
- entering new territories or partnerships
- engaging agents or representatives

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Third parties may be required to:

- confirm compliance with this policy
- demonstrate anti-bribery controls
- agree to contractual anti-corruption clauses

10. Reporting Concerns

Any individual who suspects bribery or corruption must report concerns promptly.

Concerns may be raised:

- with a line manager or senior officer
- directly with the Chief Executive Officer (Anti-Corruption Officer)
- via Head Office where confidentiality is required

Reports may be made verbally or in writing and will be handled sensitively and confidentially.

Individuals raising concerns in good faith will not be penalised.

11. Investigation and Escalation

Reported concerns will be:

- logged and reviewed by Head Office
- investigated proportionately and impartially
- escalated to the Examinations & Standards Committee where assessment integrity is implicated

Where appropriate, matters may be escalated to:

- the Grand Council
- awarding organisations
- regulators or legal authorities

12. Breaches and Sanctions

Breaches of this policy may result in:

- disciplinary action (including dismissal or termination of contract)
- withdrawal of examiner or committee roles
- invalidation of assessment decisions
- notification to awarding organisations or regulators
- referral to law enforcement

Sanctions are applied consistently and proportionately.

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13. Training and Awareness

I-PATH:

- provides guidance and training on bribery and corruption risks
- includes this policy in induction processes
- reviews awareness periodically, particularly for high-risk roles (e.g. examiners, senior staff)

14. Record-Keeping and Reporting

I-PATH:

- maintains records of reported concerns and investigations
- retains records in accordance with data protection and regulatory requirements
- reports anonymised summaries to the Grand Council as part of governance oversight

15. Policy Review

This policy is reviewed annually, or sooner where:

- regulatory expectations change
- new risks are identified
- operational or geographical expansion occurs

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