

**MODULE GUIDANCE:**

**CORPORATE SOCIAL RESPONSIBILITY: BRIBERY & CORRUPTION**

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### Purpose:

You have been asked to complete this module to be compliant with the requirements of one or more client buyers. The Bribery & Corruption module forms part of a wider set of Corporate Social Responsibility (CSR) modules which you need to complete and pass, in conjunction with the H&S module, in order to receive the CQMS Safety-Scheme certification.

This guidance explains the topics covered in the Bribery & Corruption assessment, the requirements and standards to which we assess in line with the client requirements. Please note that the assessment is a desktop-only assessment, we do not witness the work you undertake, and as such evidence needs to be uploaded to support your response.

If you are unsure of the requirements or standards, or how they apply to your organisation, after reading the relevant parts of this guidance document please contact CQMS Safety-Scheme and a member of our team will be happy to help. We provide support and guidance to companies undergoing assessment with us free of charge.

### Requirements & Standards:

All companies who work for certain client buyers are required to complete this module in full and provide relevant supporting evidence where marked.

You can 'save' the module at any time and return to complete it later. Please note that the module will not be complete or submitted to CQMS until you have submitted it by clicking the yellow 'SUBMIT' button shown below:

Module status: Awaiting completion

CSR: Anti-bribery

Submit this Module ↗

Save responses 🗄

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### Question 1

Please confirm if your company has a Bribery & Corruption Policy in place, and if so upload a copy. This must be signed by the Managing Director or Director, and dated within the last 12 months.

This is a mandatory requirement for this module, so if you don't already have an Bribery & Corruption Policy you can download a template to then amend accordingly and tailor to your company's arrangements from the 'Resources' tab and upload.

### Question 2

Please confirm when Bribery & Corruption training was last provided, and upload evidence e.g. a copy of a certificate, internal toolbox talk attendance list, etc. The training evidence must show that senior personnel (e.g. Directors, Managers involved in procurement, contracting, finance, tendering) have received Bribery & Corruption training.

This is a mandatory requirement for this module, so if you don't already have evidence available you can download a toolbox talk to brief to your workforce and record their attendance from the 'Resources' tab and upload.

### Question 3

Please confirm if you have a confidential reporting channel for personnel to raise concerns about bribery or corruption. This could be in the form of a 'whistleblowing line' which you make employees aware of. Examples include <https://protect-advice.org.uk/>

If you do not have a formal channel, please explain how you ensure that individuals can raise concerns in confidence. This includes concerns they may have with the conduct of senior management as well as other employees.

#### **Question 4**

Please list the 'adequate procedures' that you have implemented within your company to prevent the giving, or receiving, of bribes. The 6 principles of the Bribery Act are:

Proportionality, top-level commitment, risk assessment, due diligence, communication and monitoring & review.

Guidance is available from the Ministry of Justice at

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/832011/bribery-act-2010-guidance.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/832011/bribery-act-2010-guidance.pdf)

#### **Question 5**

Please confirm if your employees receive any personal remuneration e.g. via commission payments or similar.

If yes, please provide further information to explain how this operates and is monitored within the company to mitigate the risks associated with potential bribery and corruption.

#### **Question 6**

Please detail any convictions or pending prosecutions within the last 5 years for the company; this includes any former names it was known as within this time. If there are none to declare please state 'N/A'.

#### **Question 7**

Please detail any convictions or pending prosecutions within the last 5 years for Directors of the company or affiliated companies. If there are none to declare please state 'N/A'.

#### **Validity & Renewal:**

The expiry date of the Bribery & Corruption module will be aligned with the expiry date of the main H&S module (SSIP compliant) upon completion. This ensures that all competency evaluation modules expire at the same time which aids the renewal process.

If the Bribery & Corruption module is completed prior to the main H&S module, a temporary expiry date will be added and this will then be adjusted to align with the main H&S module when that is completed.

CQMS will issue reminders in advance of expiry to individuals listed as 'contacts' on your supplier profile so the renewal process can be commenced.

#### **Further information:**

Please see the CQMS Safety-Scheme Terms & Conditions, available on the CQMS Portal login page or request from CQMS Safety-Scheme. The T&Cs provide further information on the CQMS Safety-Scheme processes.