



NEW ALTERNATIVE PATH
YOUR STEPPING STONE TO SUCCESS

✉ office@newalternative.co.uk ☎ 07365 22517 🌐 <https://newalternative.co.uk/>

Anti-Bribery and Fraud Policy

1. Purpose

This policy establishes the principles and controls to prevent, detect, and respond to bribery, corruption, and fraud within New Alternative Path Student Consultancy. It supports the organisation's commitment to ethical conduct and compliance with applicable laws and ISO management system standards.

2. Scope

This policy applies to:

- All employees, consultants, and management
 - Contractors and third-party representatives
 - Business partners acting on behalf of the organisation
-

3. Policy Statement

New Alternative Path Student Consultancy adopts a **zero-tolerance approach** to bribery and fraud.

We are committed to:

- Conducting business with integrity, honesty, and transparency
 - Prohibiting all forms of bribery and corrupt practices
 - Preventing fraudulent activities in all operations
 - Ensuring compliance with applicable anti-bribery laws and regulations
-

4. Definitions

4.1 Bribery

Documented ID: NAP-2896 | Modified: 17 August 2026 | Effective: 1st September 2026 | Modified By: N. Dhera | Next Review: September 2027



NEW ALTERNATIVE PATH
YOUR STEPPING STONE TO SUCCESS

✉ office@newalternative.co.uk ☎ 07365 22517 🌐 <https://newalternative.co.uk/>

Offering, giving, receiving, or soliciting anything of value to influence a business decision improperly.

4.2 Fraud

Any intentional act of deception designed to secure unfair or unlawful gain, including financial or non-financial benefits.

4.3 Corruption

Abuse of entrusted power for private gain.

5. Prohibited Conduct

The following actions are strictly prohibited:

- Offering or accepting bribes, kickbacks, or improper payments
 - Providing gifts or hospitality intended to influence decisions
 - Falsifying records or documents
 - Misuse or theft of company or client funds
 - Facilitating payments (unofficial payments to expedite services)
 - Any form of financial or academic fraud
-

6. Gifts and Hospitality

- Modest and reasonable hospitality may be accepted if it is transparent and legitimate
 - Gifts must not influence or appear to influence business decisions
 - All gifts above [Insert Value Threshold] must be declared and recorded
-

7. Roles and Responsibilities

7.1 Management

- Ensure implementation of this policy
- Promote an ethical culture
- Conduct periodic risk assessments

7.2 Employees and Representatives

Documented ID: NAP-2896 | Modified: 17 August 2026 | Effective: 1st September 2026 | Modified By: N. Dhera | Next Review: September 2027



NEW ALTERNATIVE PATH
YOUR STEPPING STONE TO SUCCESS

✉ office@newalternative.co.uk ☎ 07365 22517 🌐 <https://newalternative.co.uk/>

- Comply with this policy at all times
- Report any suspected bribery or fraud
- Participate in training and awareness programs

8. Risk Assessment and Due Diligence

The organisation will:

- Conduct risk assessments related to bribery and fraud
- Perform due diligence on third parties and partners
- Apply risk-based controls in line with ISO principles

9. Reporting Concerns (Whistleblowing)

Employees and stakeholders are encouraged to report concerns confidentially through:

- Internal reporting channels
- Designated compliance officer

All reports will be:

- Taken seriously
- Investigated promptly
- Handled confidentially without retaliation

10. Investigation and Disciplinary Action

- All suspected incidents will be investigated fairly and thoroughly
- Violations may result in disciplinary action, including termination
- Legal action may be taken where required

11. Record Keeping

- Accurate and complete records must be maintained
- Financial transactions must be transparent and auditable
- No off-the-books accounts or false entries are permitted

Documented ID: NAP-2896 | Modified: 17 August 2026 | Effective: 1st September 2026 | Modified By: N. Dhera | Next Review: September 2027



NEW ALTERNATIVE PATH
YOUR STEPPING STONE TO SUCCESS

✉ office@newalternative.co.uk ☎ 07365 22517 🌐 <https://newalternative.co.uk/>

12. Training and Awareness

- All staff will receive regular anti-bribery and fraud training
- Awareness programs will reinforce ethical practices

13. Monitoring and Review

This policy will be:

- Reviewed periodically
- Audited as part of the Quality Management System
- Updated based on risk assessments and regulatory changes

14. Compliance

Failure to comply with this policy may result in:

- Disciplinary action
- Termination of employment or contract
- Legal consequences

Approved by: Gotse Gyorshevski