

Below-threshold ITT

Contract Reference: TCA 3-7-1736 Coordination of the Spring Place Office
Reconfiguration

DfT Counter Fraud, Bribery, Corruption and Ethical Procurement Statement

**The Department for Transport adopts a zero-tolerance approach to
procurement fraud, bribery and corruption**

Counter Fraud, Bribery and Corruption

A counter fraud culture is actively promoted amongst all staff, including procurement specialists across Department for Transport (DfT) and any lessons learnt across DfT Group.

DfT is committed to continually improve the awareness and understanding of its staff to actively prevent, deter and detect procurement fraud and bribery.

DfT is committed to reduce corruption in public procurement as set out within the Cross Government [Anti-Corruption Strategy](#).

DfT expects the highest standards of conduct and integrity from its staff, potential suppliers and its contractors. Individuals and organisations have a responsibility, in deterring procurement fraud and bribery and to report any instances where it is suspected or detected.

Supplier Code of Conduct

DfT requires potential suppliers and its contractors to adhere to the [Supplier Code of Conduct](#) and to:

- act with integrity, propriety, honesty, objectivity, accountability and openness;
- take all reasonable steps, in accordance with good industry practice, to prevent fraud and bribery by its staff and any sub-contractors;
- actively avoid, prevent and deter any behaviour or activity that might be considered as collusion, i.e. operating a cartel, bid rigging, bid suppression, cover bidding, bid rotation, market division and price fixing;
- actively avoid, prevent and deter any behaviour or activity that might be considered as bribery or corruption, in contravention of The Bribery Act

2010, e.g. paying a sum of money, or other inducement, directly or indirectly to any person/s in relation to any DfT contract or tender for goods, works or services;

- declare any conflict of interest that might arise before, during or after a procurement process;
- provide and maintain accurate contract performance records/data;
- provide and maintain accurate financial documentation, e.g. invoices.

Civil Service Code of Conduct

DfTc staff (and civil servants in executive agencies and ALBs) are required to operate in line with the [Civil Service Code](#):

- act with integrity, honesty, objectivity, and impartiality;
- be alert to the possibility that unusual events or transactions could be indicators of procurement fraud and bribery;
- be aware of their organisations gifts and hospitality policy and must not accept gifts or hospitality or receive other benefits from anyone which might reasonably be seen to compromise their personal judgement or integrity;
- automatically refuse and immediately report gifts offered either prior to or after a contract has been awarded, or some other transaction has been awarded, and where there is any doubt about the propriety of accepting, the gift must be politely refused;
- report details immediately through the appropriate channel if there are any perceived conflicts of interest or whether procurement fraud and bribery is suspected; and
- co-operate fully with Departmental/Agency Counter Fraud Officers.

In addition, DfT requires its procurement specialists to;

- deter, detect and report procurement fraud, bribery or corruption;
- ensure adequate control measures exist and operate effectively;
- undertake a detailed fraud risk assessment to identify and manage the risk of procurement fraud, bribery and corruption;
- regularly review and test control measures and implement new control measures where necessary.

Reporting of Fraud and Bribery

DfT adopts a 'zero-tolerance' culture in relation to acts of fraud, bribery and corruption. We do not permit it under any circumstances - any such acts will be investigated fully and where appropriate, disciplinary and/ or legal action will be taken, in line with Cabinet Office guidelines.

If procurement fraud or bribery is identified or suspected, please contact the Department/Agency Counter Fraud Officers, in confidence, immediately on the following telephone numbers:

Organisation	Department/Agency Fraud Officers	Whistle-blowing Hotline
Department for Transport	The DfTc Fraud Hot Line: 07827 843953, Email: Counter-FraudBribery@dft.gov.uk	The DfTc Fraud Hot Line: 07827 843953
Driver and Vehicle Licensing Agency	01792 782650	01792 788883
Driver and Vehicle Standards Agency	0300 123 3248	07920 592902
Maritime and Coastguard Agency	07772 352319 Email: FraudAndBribery@mcga.gov.uk	07772 352319
Vehicle Certification Agency	0117 952 4205	0117 952 4126

It is important that notifications are made promptly and that no action is taken which may prejudice any future action or may alert a potential perpetrator that the fraud or potential act of fraud has been identified.

DfT will treat all reports in a confidential and sensitive manner. If procurement fraud, bribery or corruption is suspected, DfT will consider and investigate and may report the matter to:

- Departmental/Agency Counter Fraud Officers;
- The Police (Action Fraud) and share with counter fraud organisations.

If procurement fraud or bribery is proven (i.e. sanctioned) DfT may:

- exclude a potential supplier from a procurement procedure;
- suspend or terminate a contract with a supplier;
- take steps to recover financial losses,
- pursue criminal sanctions.

Fair Employment Practices

DfT requires suppliers and their contractors to maintain high standards of integrity and professionalism in their business dealings, adhering to the laws of the countries where they operate and taking action where necessary to minimise negative impacts and potential risks.

The Government has made clear its determination to tackle modern slavery crimes and DfT is committed to mitigate these crimes throughout its supply chain.

Under Section 54 of the [Modern Slavery Act 2015](#), commercial organisations which carry on a business or part of a business in the UK, supply goods or services and have an annual turnover of £36 million or more are required to prepare a slavery and human trafficking statement for each financial year of their organisation.

Prompt Payment

DfT is committed to ensuring responsible procurement practices are realised throughout the supply chain, this includes an expectation that its suppliers and their sub-contractors will comply with the prompt payment code throughout their supply chain. For further details refer to the [Prompt Payment Code](#).

Protecting the Environment

DfT is committed to ensuring better management of resources, enhancing degraded environments and recognising the importance of natural resources throughout the procurement lifecycle. DfT recognise that having regard for the environment is crucial for the wellbeing of current and future generations.

DfT expects suppliers and its contractors to comply with all applicable environmental laws, regulations and standards as well as implementing an effective system, such as [ISO 14001](#) or equivalent, to identify and eliminate potential hazards to the environment.

Health & Safety

DfT expects its suppliers and contractors to strive to implement high standards of occupational health and safety. Compliance with applicable occupational health and safety regulations is expected to provide a work environment that is safe and conducive to good health, in order to preserve the health of employees and prevent accidents, injuries and work-related illnesses. Alignment with standards such as [ISO 45001](#), or equivalent, is encouraged.

Social Value

DfT is committed to promoting economic sustainability through the government's [social value framework](#) which involves the promotion of development, growth and prosperity for the nation through public procurement. For examples of this see, [The Transport Infrastructure Skills Strategy](#) and the [Armed Forces Covenant](#).