

The objective of this document is to:

- support the Practice's stated policy that our business culture is one where bribery is never acceptable;
- record the receipt and payment of any gift and/or hospitality; and
- act as evidence of appropriate procedures to prevent bribery.

This document derives from guidance provided by the Ministry of Justice which can be found at the following internet address:

<http://www.justice.gov.uk/guidance/making-and-reviewing-the-law/bribery.htm>

Compliance On Call accepts no liability for any liability or regulatory penalty arising from the use of this document, even if used correctly. You should review the above advice and ensure that any documents and procedures that you adopt are suitable to an organisation with your risk profile.

Policy Statement: *Our Practice is committed to carrying on its business fairly, openly and honestly. Our business culture is one where bribery is never acceptable.*

A. Gifts, Payments and Hospitality

1. All individual gifts, payments or hospitality with a value over £75.00 must be recorded. All gifts, payments or hospitality with a cumulative value over £250 within a year period must be recorded: An example of the register which you must record is below

Date	Recipient	Provider	Details and value	Justification	Authority

B. Policy on whistle-blowing

Policy Statement: Our Practice is committed to carrying on its business fairly, openly and honestly. Our business culture is one where bribery is never acceptable.

Everyone in the Practice, whatever their level, is allowed full access to this record within normal business hours. In the event that they become aware of any reward, gift or hospitality being received or provided by anyone in the Practice they may check this record to see that it is duly authorised.

If they identify any reward, gift or hospitality that has not been disclosed and authorised, they should, as long as that person is not connected to the matter, report in the first instance to their line manager. If their line manager is involved, they should report to the next manager in line above that level.

If the recipient or provider is a partner or Director of the Practice they should report to another partner or Director.

All partners and Directors of the Practice undertake that they will not take any disciplinary action or otherwise discriminate against anyone who raises a genuine concern about matters relating to the Bribery Act, whether the concern proves to be valid or unfounded and no matter what position in the organisation the recipient or provider holds.

On receipt of any evidence that any gift, reward or hospitality has been given or received and not adequately disclosed and recorded, the relevant line manager, Director, or partner, will report the matter to the board or all of the members, excluding any Director or partner who may be involved in the allegation.

The Practice will investigate the circumstances, giving the individual concerned an opportunity to explain the transaction and give reasons for not seeking appropriate authority.

Any wilful failure to obtain authority for a qualifying transaction or series of transactions may be treated as a disciplinary matter, even if the investigation finds that the transaction was one that could have been authorised.

If the failure is significant enough to suggest that there may be an element of wrongdoing or bribery, it may comprise gross misconduct and could result in immediate dismissal.