




Bribery Policy

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BRIBERY POLICY

This document is created by 2020 Safety Training Ltd (*further referred to as, 2020 STL*). Bribery is the offering, giving, receiving, or soliciting of any item of value to influence the actions of an official, or other person, in charge of a public or legal duty and to incline the individual to act contrary to their duty and the known rules of honesty and integrity. 2020 STL bribery policy is designed to enable 2020 STL and its partnered professional bodies and institutes, to work co-operatively to eliminate any form of bribery through strict adherence to government guidelines and definitions of bribery. 2020 STL will not tolerate actions or attempted actions of bribery internally or with partners.

AIMS OF THE POLICY

- To identify and minimise the risk of bribery by staff, learners, contractors or associated persons.
- To protect the integrity of 2020 STL, their stakeholders and its services.
- To set out clear rules and regulations regarding potential bribes.
- To explain how employees of 2020STL should handle any bribes that they encounter.
- To help protect 2020 STL employees from the consequences of knowingly or unknowingly accepting a bribe.
- To ensure employees of 2020 STL do not advertently or inadvertently offer bribes.
- To respond to any incident of alleged malpractice objectively.
- To protect the reputation of 2020 STL.

For the purposes of this policy, bribery is defined as... an act that offers, gives, receives, or solicits of any item of value to influence the actions of an official, or other

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person, in charge of a public or legal duty and to incline the individual to act contrary to their duty and the known rules of honesty and integrity.

EXAMPLES OF BRIBERY

This list is not exhaustive and other instances/definitions of bribery may be considered by 2020 STL at its discretion.

- A person must pay a bribe to get what is rightfully theirs (form of extortion).
- Direct extortion.
- A bribe is paid to swing a business deal.
- A bribe is paid for an official to look the other way if something is wrong.
- A bribe payer gives money or promise of something else of value to speed up time take to process files such as assessments.
- A bribe payer gives money or promise of something else of value to change the results of a process such as an assessment.

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INVESTIGATIONS

Upon receipt of a case of alleged bribery 2020 STL Management team will give any parties involved in bribery the opportunity to provide a statement. The purpose of the statement is to clarify if the bribing person enacted it as a premeditative action.

2020 STL Management team will consequently conduct a thorough investigation in to allegations of bribery. Investigations will be conducted in a fair, reasonable and legal manner, ensuring that all relevant information is considered without bias. The main purpose of an investigation is to establish the facts relating to the allegation(s) made in order to determine if any regulations have been breached and to determine whether there is any irregularity. The investigation will also aim to establish the facts, circumstances and scale of the alleged misconduct. The investigation will consider the broader impact the bribery could have had on the business. The investigation of an alleged bribery will:

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- Establish the facts, circumstances and scale of alleged of misconduct.
- Identify, and if necessary, take action against any damage caused.
- Identify evidence to support any action/decision to be applied.
- Show that discussions have been conducted with individuals/candidates and/or staff involved.

REPORTING BRIBERY TO PROFESSIONAL BODIES

Once a thorough investigation has been conducted by 2020 STL, depending on the level of indiscretion, the full report is issued to the relevant professional body containing:

- A statement of the facts.
- Detailed account of the circumstances of alleged bribery, with details of any investigations carried out by 2020 STL.
- Written statements from persons involved and the investigation team.
- Any video or audio evidence.
- In the case of any person(s) misconduct, remedial actions will be taken by 2020 STL to ensure the integrity now and in the future.

PENALTIES FOR INDIVIDUALS GUILTY OF BRIBERY

If after a thorough investigation it is clear that bribery has occurred, the person will be informed of the consequences in writing. Depending on the nature i.e. of deliberate or not for example, the person(s) involved will face sanctions. In accidental cases:

- The candidate is issued with a warning that if the offence is repeated within a set period of time, further specified sanctions will be applied.
- The person(s) will be retrained and referred to the employee handbook, given a ToolBox Talk to sign.
- May be subjected to another probationary period.

In cases where the person(s) was found to have deliberately/knowingly committed an act of bribery:

- The person(s) may be subject to summary dismissal in accordance with Company disciplinary procedures.

RIGHT OF APPEAL

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Any individual subject to sanctions has the right to appeal against any decision or sanctions imposed by 2020 STL or its professional bodies. An appeal must be made in writing to the *Company Directors of 2020 Safety Training LTD, 86 Auchanshangan Drive, Saltcoats, KA21 6DS* within 30 working days from receipt of the outcome. Details of the professional body's appeals procedure will then be relayed to the learner within 10 working days. The learner does have the right of access to all the evidence used by parties to make its decision at this stage.

Professional bodies do have their own Bribery policies and procedures. These documents should be read alongside 2020 STL Bribery policy as information may vary. Further details are available on specific awarding bodies websites.

APPENDIX 1: BRIBERY ACT 2010

Bribery Act 2010

Review frequency: Bi-annual

Senior Manager: Operations Manager