

Anti-Bribery Policy

Introduction

The Bribery Act 2010 came into force on 1 July 2011 and introduces an offence for organisations of “failing to prevent bribery”. Under the Act organisations need to have in place adequate procedures to prevent bribery occurring.

Statement

Best Practice Training & Development Ltd values its reputation for ethical behaviour and for financial probity and reliability.

We have a zero tolerance for bribery and corruption. Our reputation with the learners and organisations that we serve, and other stakeholders is underpinned by ethical behaviour, financial probity and honesty.

We aim to limit exposure to bribery by:

- Setting out a clear anti-bribery policy;
- Encouraging staff to be vigilant and to report any suspicious behaviour, providing them with suitable channels of communication and ensuing sensitive information is treated appropriately.
- Rigorously investigating instances of alleged bribery and assisting police and other appropriate authorities in resultant prosecution;
- Taking firm and vigorous action against any individuals involved in bribery;
- Embedding an understanding of our anti-bribery policy amongst all its staff, “associated persons” (any person performing services for or on behalf of the organisation) and external persons/organisation with whom we have commercial relations;
- Training staff as appropriate so that they can recognise and avoid the use of bribery by themselves and others.

All employees and associated persons are responsible for maintaining the highest standards of business conduct and are expected to behave honestly and with integrity. Any breach of this policy will contribute a serious disciplinary offence which may lead to dismissal and may become a criminal matter for the individual.

We prohibit employees and associated persons from offering, giving, soliciting or accepting any bribe. The bribe might include cash, a gift or other inducement, to or from any person or organisation wherever they are situated and irrespective of whether or not they are a public official/body or private person or company by any individual governor, employee, agent or other person or body acting on our behalf.

The bribe might be made in order to:

- Gain any commercial, contractual or regulating advantage for Best Practice in a way which is unethical;
- Gain any personal advantage, pecuniary, or otherwise, for the individual or anyone connected with the individual.

This policy is not intended to prohibit appropriate corporate entertainment and/or hospitality undertaken in connection with our business activity, provided the activity is customary under the circumstances, is proportionate and is properly recorded/disclosed to Best Practice in accordance with procedures.

Employees and associated persons are requested to remain vigilant in preventing, detecting and reporting bribery. Employees and associated persons are expected to report concerns regarding suspected bribery in accordance with the Whistleblowing/Malpractice procedures.

The Anti-Bribery Policy is the responsibility of the Managing Director to implement. If you believe that you have witnessed or have information relating to an act of bribery, then please contact:

Managing Director
 Best Practice Training & Development Ltd
 First Floor, Centre Block, Hille Business Centre
 132a St Albans Road
 Watford WD24 4AE

Date of Policy - 10.01.2019
 Review date - 10.01.2020