

Bribery and Corruption Policy

It is company policy to conduct business in an honest way, and without the use of corrupt practices or acts of bribery to obtain an unfair advantage.

Bodywork Company is committed to ensuring adherence to the highest legal and ethical standards. This must be reflected in every aspect of the way in which we cooperate. We must bring integrity to all our dealings.

This is not just a cultural commitment on the part of the organisation; it is a moral issue and a legal requirement. Bribery is a criminal offence in most countries, and corrupt acts expose the Company and its employees to the risk of prosecution, fines and imprisonment, as well as endangering the Company's reputation.

Introduction

This policy has been introduced to comply with The Bribery Act 2010. This act introduces an offence for organisations who are 'failing to prevent bribery'. Organisations need to have in place adequate procedures to prevent bribery occurring in order to fulfil the requirements of this act.

Policy Statement

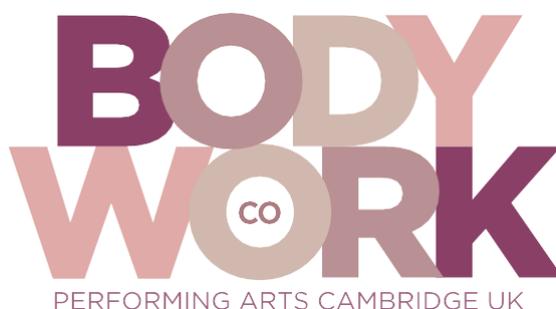
Bodywork Company values its reputation for ethical behaviour and for financial integrity. It recognises that over and above the commission of any crime, any involvement in bribery would also reflect adversely on its image and reputation. Therefore, Bodywork Company aims to avoid exposure to bribery by:

- Setting out a clear anti-bribery policy.
- Encouraging all college members to be vigilant and to report any suspicions of bribery, providing appropriate channels of communication and ensuring that sensitive information is handled properly.
- Ensuring that all instance of alleged bribery is investigated, assisting police and other appropriate authorities in any consequential prosecution.
- Taking appropriate action against any person(s) involved in bribery.

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Scope

This policy applies to all staff, students and visitors who attend Bodywork Company in any capacity. Bodywork Company prohibits the suggestion of, the offering, the giving or the acceptance of any bribe. This includes cash or other enticement to or from any person or body acting on Bodywork Company's behalf in order to gain any advantage for the College in a way which is unethical or in order to gain any personal advantage, fiscal or otherwise, for the individual or anyone connected with the individual.

Further Clarification

Bodywork Company recognises that practice varies across the areas in which it does business and what is normal and acceptable in one place may not be in another. This policy statement prohibits any inducement which results in a personal gain or advantage to the recipient or any person or body associated with them and which is intended to influence them to take action which may not be solely in the interests of Bodywork Company.

This policy is not meant to prohibit the following practices providing they are customary, are proportionate and are properly recorded:

- Normal and appropriate hospitality.
- The giving of a ceremonial gift on a festival or another special time.

Inevitably, decisions as to what is acceptable may not always be easy. If anyone is in doubt as to whether a potential act constitutes bribery, the matter should be referred to your line manager. If necessary, guidance should also be sought from the Principal.

Staff Responsibility

The prevention, detection and reporting of bribery is the responsibility of all staff throughout the College. Suitable channels of communication by which staff and others can report confidentially any suspicion of bribery will be maintained by Line Managers and Senior Staff.

