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1. Introduction

- 1.1 Employees may, in the course of their duties, have access to, or come into contact with, confidential information of a confidential nature. Their terms and conditions provide for the possibility of dismissal for poor performance of their duties, and employees are forbidden from disclosing such information or making use of it in any form whatsoever, such as in the media or on social media.
- 1.2 However, the law allows for the disclosure of certain information. In order for a disclosure to be a 'protected disclosure' of certain information, the disclosure must relate to a specific subject matter (classified as a 'protected disclosure'). Disclosure must also be made in an appropriate way (disclosure must be made in an appropriate way (disclosure which, in the interest of the public, is made in the interest of the employee making the disclosure).
- 1.3 [«Insert Company Name»] is committed to compliance with the Bribery Act 2010 and actively encourages a culture of honesty and openness. Employees are required to bring up to their manager or other appropriate person any issue that, in the employee's opinion, might constitute a breach of the Bribery Act 2010.]

2. Specific Subject Matter

If, in the course of employment, an employee becomes aware of information which they reasonably believe to be true and which, if disclosed, would be in the Company's disclosure procedure.

- 2.1 That a criminal offence is being committed or is likely to be committed.
- 2.2 That a person has failed, or is likely to fail, to comply with any legal obligation to which he or she is subject.
- 2.3 That a miscarriage of justice has occurred, is occurring, or is likely to occur.
- 2.4 That the health or safety of any individual has been, is being, or is likely to be, endangered.
- 2.5 That the environment has been, is being, or is likely to be, damaged.
- 2.6 That information tending to show that any of the above, is being, or is likely to be, disclosed, has been, is being, or is likely to be, deliberately concealed.
- 2.7 [That the business or organisation has been, is being, or is likely to be receiving or offering a bribe or is likely to be bribed or offered a bribe.]
- 2.8 That any foreign or international law has been, is being, or is likely to be broken or is likely to be bribed or offered

facilitation payment

associated person.]

3. Disclosure Procedure

3.1 Information which is more of the above should be reported to any appropriate authority

who believes tends to show one or more of the above should be reported to <<e.g. manager>> so that

3.2 If it is inappropriate to report to the manager, the employee should speak to <<e.g. HR>>

where appropriate. If it is inappropriate to report to the manager, the employee

3.3 Employees will suffer no adverse consequences in accordance with this policy for making such a disclosure in confidence

in confidence. Employees will suffer no adverse consequences for making such a disclosure in

3.4 However, failure to report information losing it to the public domain

may result in the disclosure of information to the public domain

3.5 For further guidance on the disclosure procedure, please refer to the Whistleblowing Policy <<e.g. manager>>.

letter or concerning the use of the Whistleblowing Policy should speak in confidence to the appropriate person

This policy has been approved & signed by:

Name: <<Insert Name>>

Position: <<Insert Position>>

Resources Manager>>

Date: <<Date>>

Signature:

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