

1. Introduction

- 1.1 Members may, in performing their duties, have access to, or come into contact with, information of a confidential nature. The <<LLP Agreement>> provides that members are forbidden from making use of in any form whatsoever, such confidential information.
- 1.2 However, the law allows for a 'protected disclosure' of certain information. In order for a disclosure to be a 'protected disclosure' it must relate to a specific subject matter (classified as a 'protected disclosure') and the disclosure must also be made in an appropriate way (classified as a 'protected disclosure'). The protection is confined to a disclosure which, in the opinion of the member making the disclosure, is made in the public interest.
- 1.3 [The LLP is committed to be in compliance with the Bribery Act 2010. It encourages a culture of honesty and openness and therefore requires members to bring up to their <<Insert Name of other designated person any issue relating to bribery or corruption.>>]

2. Specific Subject Matter

If, in the course of membership, a member becomes aware of information which they reasonably believe tends to show that the LLP is engaged in the following, they must use the LLP'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 person 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 any of the above, is being, or is likely to be, deliberately concealed.
- 2.7 [That the LLP or any of its members has been, is being, or is likely to be involved in bribery or corruption.]
- 2.8 That any foreign official has been, is being, or is likely to be bribed or offered facilitation payment.

3. Disclosure Procedure

- 3.1 Information which a member believes tends to show one or more of the above should be disclosed to <<e.g. relevant designated member>> so that appropriate action can be taken.
- 3.2 If it is inappropriate to disclose information to the designated member, the member should speak in confidence to the relevant individual>>.
- 3.3 Members will suffer no detriment for making such a disclosure in accordance with this policy.
- 3.4 However, failure to disclose information may result in the disclosure of information losing its effectiveness.
- 3.5 For further guidance on the disclosure procedure or concerning the use of the disclosure procedure, members should speak in confidence to <<e.g. relevant designated member>>.

This policy has been approved & signed by:

Name: <<Insert Name>>
Position: <<Insert Position, e.g. Resources Manager>>
Date: <<Date>>
Signature: