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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 confidentiality of such information. In order to ensure proper performance of their duties, employees are forbidden from disclosing such information or making use of it in any form whatsoever, such as in the course of their duties.

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1.2 However, the law allows for the disclosure of certain information. In order for such a disclosure to be a 'protected disclosure' of certain confidential information, the disclosure must relate to a specific subject matter (classified as confidential information) and the 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, is made).

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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 Act. [

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2. Specific Subject Matter

If, in the course of employment, an employee becomes aware of information which they reasonably believe to be confidential information of the Company's disclosure procedure, they must use the following disclosure procedure:

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2.1 That a criminal offence is being committed or is likely to be committed.

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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.

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2.3 That a miscarriage of justice has occurred, is occurring, or is likely to occur.

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2.4 That the health or safety of any individual is or is likely to be endangered.

That the health or safety of any individual is or is likely to be endangered.

2.5 That the environment is or is likely to be damaged.

That the environment is or is likely to be damaged.

2.6 That information to which the disclosure procedure applies has been, is being, or is likely to be, deliberately concealed.

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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.]

[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 broken.

That any foreign or international law has been, is being, or is likely to be broken or is likely to be broken.

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 detriment or disadvantage in accordance with this policy for making such a disclosure in confidence

in confidence. Employees will suffer no detriment or disadvantage for making such a disclosure in

3.4 However, failure to report information losing it to the appropriate authority

may result in the disclosure of information to the appropriate authority

3.5 For further guidance on the disclosure procedure, employees should speak in confidence to <<e.g. manager>>.

the appropriate authority. For further guidance on the use of the disclosure procedure, employees should speak in confidence to

This policy has been approved & signed by:

Name: <<Insert Name>>

Position: <<Insert Position>>

Resources Manager>>

Date: <<Date>>

Signature:

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