

IWFM Anti Bribery and Corruption Policy

Bribery Act 2010



Institute of Workplace and Facilities Management Anti Bribery and Corruption Policy

Purpose of the Policy

The Bribery Act 2010 is an Act of the Parliament of the United Kingdom that covers the criminal law relating to bribery. The Act prohibits bribery and enforces organisations to ensure their staff, representatives and associates are not engaging in corruption. The Institute of Workplace and Facilities Management (IWFM) operates with integrity and therefore complies with this legislation and does not knowingly engage in this type of conduct.

Scope

This policy applies to all; employees, volunteers, and associates [including but not limited to consultants, assessors, EQA's, Tutors etc.] acting on behalf of IWFM

Definition

“Bribe” means a financial or other advantage or incentive for action which is illegal or unethical. Bribes can take the form of money, gifts, hospitality, services or any other reward or benefit.

Under the Act, it is illegal:

- to give, promise or offer a bribe
- to accept or offer to receive a bribe
- to bribe a foreign public official
- for a commercial organisation to fail to have the adequate procedures in place to prevent bribery

Principles

The Bribery Act 2010 guidance details preventative procedures under six management principles that reflect best practice for good corporate governance.

Principle 1 - Proportionate Procedures

Preventative measures should be clear, practical, accessible, effectively implemented and enforced.

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- IWFM holds a gift register. If any member of staff, volunteer, Board or Board committee member receives a gift; inclusive of invitations and corporate hospitality, then this should be recorded in the gift register, managed by the Company Secretary.
- Reasonable and proportionate hospitality or promotional business expenditure is not prohibited where there are legitimate purposes, such as building relationships, maintaining our image or reputation, or marketing our products and services.

Principle 2 - Top Level Commitment

The Board of Directors and the Executive implement effective leadership controls in bribery prevention. IWFM's business is carried out fairly, honestly, transparently and all employees and volunteers are bound by the Disciplinary Policy and Code of Professional Conduct respectively.

Principle 3 - Risk Assessment

The level of preventative action undertaken by an organisation is indicative of the associated risk level and scale of the organisation's commercial activities.

Principle 4 - Due Diligence

IWFM applies due diligence procedures, in respect of those who perform or will perform services for or on behalf of the organisation in order to mitigate identified risks of bribery.

Principle 5 - Communication

IWFM seeks to ensure that its bribery prevention policies and procedures are embedded and understood throughout the organisation through communication and training. There must also be a secure, confidential and accessible means for the reporting of bribery, therefore IWFM has a Whistle Blowing Policy in place, that can be found in the staff handbook or on the IWFM website.

Principle 6 - Monitoring and Review

IWFM monitors and reviews procedures in place to prevent bribery and proactively introduces improvements where necessary.

Gifts and Hospitality

All offerings of gifts and hospitality should be declared to the Company Secretary, who will document the occurrence in the Gift Register. Acceptance of gifts and hospitality are subject to the guidance in this policy and where there are perceived discrepancies, the Company Secretary shall have the final say. However, if a staff member or volunteer does not agree with the Company Secretary's decision there is a line of appeal to the CEO and subsequently to the IWFM Board.

Where acceptance of hospitality has been considered and approved by the Company Secretary, the following terms apply:

- As a representative of IWFM conduct must, at all times, be professional and appropriate
- Drinking is allowed; but unruly or drunken behaviour will not be tolerated, and any subsequent issues will be settled within the guidelines of the organisation's disciplinary process

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- Appropriate travel expenses to and from the venue on the day will be reimbursed; but no further expenses will be paid (including hotel accommodation)
- No promises are to be given regarding the purchase of products or services to the host organisation
- The sole purpose of attendance is to build relationships with the organisation to pursue the interests and objectives of IWFM
- All invited guests must declare the gift to the Company Secretary. Each guest will require approval that is pragmatically determined by their suitability and or role type to attend.

Failure to Comply

The maximum legal penalty for committing a crime under the Act is a maximum of 10 years' imprisonment, along with an unlimited fine.

The IWFM sanctions for an employee committing a crime would be dealt with under the IWFM disciplinary policy and could result in instant dismissal. For other representatives or associates of IWFM [including Volunteers] membership would be revoked and where necessary the person reported to the police.

All forms of bribery are strictly prohibited. If you are unsure whether a particular gesture or act is considered bribery, this should be raised with the Company Secretary immediately.

If an employee gives or receives a bribe, they may be subject to disciplinary action under the Disciplinary Policy and Code of Professional Conduct.

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Contact us

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