Ethical Business Practices Policy & Procedure

1. Purpose

To establish clear standards for ethical conduct across all business operations, ensuring compliance with UK laws, promoting integrity, preventing misconduct, and fostering a culture of transparency, fairness, and accountability.

2. Scope

This policy applies to all employees, contractors, agency workers, managers, directors, and third-party partners representing or acting on behalf of the organisation.

3. Legal Framework

This policy aligns with relevant UK legislation, including:

- **Bribery Act 2010**
- **Modern Slavery Act 2015**
- **Equality Act 2010**
- **Companies Act 2006 (Directors' Duties)**
- **Data Protection Act 2018 & UK GDPR**
- **Health and Safety at Work Act 1974**
- **Public Interest Disclosure Act 1998 (Whistleblowing)**
- **Employment Rights Act 1996**
- **Competition Act 1998**

Where internal standards exceed legal requirements, the higher standard applies.

4. Policy Statements

4.1 Integrity & Honesty

- Employees must act honestly, transparently, and in the best interests of the organisation.
- Fraud, deception, or misrepresentation is strictly prohibited.

4.2 Compliance with Laws

- All business activities must comply with applicable UK laws, industry regulations, and contractual obligations.
- Employees must follow internal policies, procedures, and ethical guidelines.

4.3 Anti-Bribery & Corruption

- Offering, giving, requesting, or accepting bribes is prohibited.
- Gifts and hospitality must be reasonable, proportionate, and recorded according to the organisation's Gift & Hospitality Register.
- Facilitation payments are not permitted.

4.4 Fair Competition

- Employees must not engage in anti-competitive behaviour, price-fixing, bid-rigging, or collusion.
- Confidential commercial information must not be shared with competitors.

4.5 Respect, Equality & Inclusion

- The organisation is committed to equal opportunities and non-discrimination under the Equality Act 2010.
- Bullying, harassment, victimisation, and discriminatory behaviour are prohibited.
- All employees must treat colleagues, clients, and partners with dignity and respect.

4.6 Modern Slavery & Human Rights

- The organisation prohibits forced labour, human trafficking, and exploitation.
- Suppliers must comply with the Modern Slavery Act 2015.
- Any concerns must be reported immediately.

4.7 Data Protection & Confidentiality

- Employees must protect personal and sensitive data in accordance with UK GDPR and the Data Protection Act 2018.
- Confidential information must not be disclosed without authorisation.

4.8 Health, Safety & Wellbeing

- The organisation is committed to providing a safe working environment under the Health and Safety at Work Act 1974.
- Employees must follow safety procedures and report hazards or incidents promptly.

4.9 Environmental Responsibility

- Employees must support sustainable practices and comply with environmental regulations.
- Waste reduction, responsible resource use, and pollution prevention are encouraged.

4.10 Ethical Procurement & Supply Chain

- Suppliers must be selected based on fairness, quality, compliance, and ethical standards.
- Conflicts of interest must be declared and managed appropriately.

4.11 Whistleblowing & Reporting Concerns

- Employees may report unethical behaviour confidentially under the Public Interest Disclosure Act 1998.
- Retaliation against whistleblowers is prohibited.

5. Procedures

5.1 Reporting Ethical Concerns

1. Employees report concerns to:
    - Line Manager
    - HR Department
    - Compliance Officer
    - Anonymous whistleblowing channel (if available)
2. Reports are investigated promptly and confidentially.
3. Findings are documented and corrective actions implemented.

5.2 Managing Conflicts of Interest

1. Employees must declare any personal, financial, or family interests that may influence business decisions.
2. HR or Compliance reviews declarations.
3. Controls are implemented (e.g., removal from decision-making).

5.3 Gifts & Hospitality

1. Employees must record gifts or hospitality above the organisation's threshold.
2. Compliance reviews entries for appropriateness.
3. Any gift that may influence decision-making must be declined.

5.4 Supplier & Partner Due Diligence

1. Procurement conducts ethical and compliance checks before onboarding suppliers.
2. Suppliers must agree to the organisation's ethical standards.
3. High-risk suppliers undergo periodic audits.

5.5 Data Protection Compliance

1. Employees complete mandatory data protection training.
2. Personal data is processed only for legitimate business purposes.
3. Data breaches must be reported immediately to the Data Protection Officer.

5.6 Modern Slavery Controls

1. HR and Procurement assess supply chain risks annually.
2. Modern Slavery Statements are published where legally required.
3. Any suspicion of exploitation triggers immediate investigation.

5.7 Disciplinary Action

1. Breaches of this policy may result in disciplinary action up to and including dismissal.
2. Serious breaches may be reported to external authorities.

6. Roles & Responsibilities

Employees

- Follow ethical standards and report concerns.
- Avoid conflicts of interest.
- Protect confidential and personal data.

Managers

- Lead by example and promote ethical behaviour.
- Ensure teams understand and follow this policy.
- Address concerns promptly.

HR Department

- Provide training and guidance.
- Manage whistleblowing and investigations.
- Maintain compliance documentation.

Compliance Officer / Senior Management

- Oversee policy implementation.
- Review ethical risks and controls.
- Ensure legal compliance and continuous improvement.

7. Monitoring & Review

- HR and Compliance conduct annual reviews of ethical risks, training completion, and policy effectiveness.
- The policy is updated whenever UK laws or organisational requirements change.

8. Policy Approval

This policy is approved by senior management and forms part of the organisation's governance and compliance framework.

Next review date is 30/11/2026

Efosa Ekhator

Head of centre