

ANTI BRIBERY AND CORRUPTION POLICY**Symbios Health****Controlled Document**

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Reference number	POL105
Version	1
Date ratified	12.09.2023
Due for review	12.09.2025
Review period	Two years unless a need for review has been identified
Committee/individual responsible	Company Director Symbios Health
Target audience	All Symbios Health staff
It is the responsibility of the Administration team to ensure this document is updated in a timely manner, controlled, and shared via teams.	
Uncontrolled Document if Copied	

EMBIOS HEALTH
Empowering Healthy Working

Implementation plan

Group	Objective	Method	Lead	Target Start	Target End	Resources
All employees	Employees to read and understand this policy.	Policy available on Symbios S-drive	Clinical Lead, Company Director	Aug 23	Dec 23	Employees to attend Teams meeting. Reference to S-drive.

Amendments

Version	Changes including page number	Date

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1. Legislation

Under the Bribery Act 2010, it is illegal to offer, promise, give, request, agree, receive, or accept bribes. It is also illegal to solicit something of value to influence the actions of an individual or individuals. The UK government recommends that any company, business or organisation that has any risk of being exposed to bribery should have an anti-bribery policy.

2. Policy Statement

All employees need to be aware it is illegal to offer, promise, give, request, agree, receive, or accept bribes.

3. Purpose and Scope

The purpose of this policy is to alert Symbios Staff to the potential risk and mitigate against the risk. This policy applies to all staff employed by Symbios Health.

4. The Potential Risk

Symbios Health recognises the potential risk of bribes being offered to doctors reviewing employment and staff undertaking health surveillance due to the nature of the business. Clients may want an employee declared as fit or unfit, employees may be worried about losing their jobs, others may want their employment to be terminated.

While the likelihood of a staff member being bribed is very low Symbios Health encourages all staff to be aware of the risk, decline and immediately alert the Operations Manager should a bribe be offered. The Operations Manager will investigate and alert Dr Cooper.

Accepting a bribe in any shape or form, either knowingly or unknowingly could damage the reputation of Symbios Health and our commitment to carry out our business professionally, fairly, with openness and integrity.

Symbios Health has a zero tolerance towards bribery.

5. What could happen if I accept or offer a bribe?

Should Symbios Health, or an employee of Symbios Health, conduct or accept a bribe, Symbios Health and the employee concerned could be held to account. Offences committed under the Bribery Act carry a heavy fine or even a jail sentence.

A company or business that fails to prevent employees or other people associated with the company from committing acts of bribery can be prosecuted under the Bribery Act.

However, if an employee of your company pays or receives a bribe, either directly or indirectly, the company may be entitled to a statutory defence and be protected by law if you have an adequate anti-bribery policy that has been signed by all employees.

The statutory defence will not apply to the employee accepting or offering a bribe.

6. What is a bribe?

You must not accept any monies, promises or gifts from a client or employee to affect an outcome. e.g., a health surveillance or clinical report.

You must not accept any monies, promises or gifts from any company to affect the outcome of any contract.

7. What can I accept?

Any reasonable beverages or food offered by the client while undertaking the business of Symbios Health.

Any reasonable accommodation paid for by the client and deemed essential in order to carry out the business of Symbios Health.

Any reasonable travel arrangements paid for by the client and deemed essential in order to carry out the business of Symbios Health.

8. What must I do?

Declare any conflict of interest when undertaking the business of Symbios Health.

Ensure complete transparency when undertaking the business of Symbios Health.

Escalate any concerns to the Operations Manager.



The Operations Manager will investigate and alert Dr Cooper.

9. Linked Documentation

Disciplinary Procedure SOP201

10. Review and Authorisation

REVIEWED BY and ROLE	SIGNATURE	DATE
Not applicable - new policy	Not applicable	Not applicable

AUTHORISED BY	SIGNATURE	DATE
Dr Oliver Cooper		12.09.2023
Symbios Health Director Deborah Wassell		12.09.2023
Author - Head of Governance/ISO Lead		

11. Quality Impact Assessment/Employee

		Yes/No	Comments
1.	Does the policy/guidance affect one group less or more favourably than another on the basis of:		
	Race	No	
	Ethnic origins (including gypsies and travellers)	No	
	Nationality	No	
	Gender	No	
	Culture	No	
	Religion or belief	No	
	Sexual orientation including lesbian, gay and bisexual people	No	
	Age	No	
	Disability - learning disabilities, physical disability, sensory impairment, and mental health problems	No	
2.	Is there any evidence that some groups are affected differently?	No	
3.	If you have identified potential discrimination, are any exceptions valid, legal and/or justifiable?	n/a	
4.	Is the impact of the policy/guidance likely to be negative?	No	
5.	If so, can the impact be avoided?	n/a	
6.	What alternatives are there to achieving the policy/guidance without the impact?	n/a	
7.	Can we reduce the impact by taking different action?	n/a	