



UCP
GROUP

Up Close and Personal Group Ltd

Anti-Bribery Policy

Date of Issue of Policy: 16th February 2024

Signature of Chief Executive

Criss Watts

1. Duty of the Centre

UCP Group Ltd will ensure all staff receive appropriate information about bribery and what is meant by bribery as defined by the Bribery Act 2010. All staff employed by the organisation will sign that they have understood the policy and the implications for them. That there are no reported incidents of bribery as defined by the Bribery Act 2010. Assessment of evidence against the specified Assessment Criteria is a process with assessors giving constructive feedback at the time of the assessments through assessment feedback.

UCP Group Ltd takes our responsibilities under the Bribery Act very seriously. If found to be in breach of the Bribery Act 2010 it may result in an unlimited fine and considerable reputational damage. In addition, UCP Group Ltd may also be debarred from participation in public tenders. Given the nature of UCP's business it is therefore essential that UCP Group Ltd takes a zero-tolerance approach to bribery and corruption.

This policy is essential to ensure that UCP Group Ltd can demonstrate that it has adequate procedures in place to prevent bribery.

It is the person's responsibility to read and be confident that they understand and fully comply with this policy. In any area of doubt the Registered Manager should be approached to provide a further explanation.

What is not acceptable?

- It is not acceptable for an individual engaged by UCP Group Ltd (or someone on their behalf) to:
- Give, promise to give, or offer, a payment, gift or hospitality with the expectation or hope that a business advantage will be received, or to reward a business advantage already given.



- Give, promise to give, or offer, a payment, gift or hospitality to a government official, agent or representative to "facilitate" or expedite a routine procedure.
- Accept payment from a third party that you know, or suspect is offered with the expectation that it will obtain a business advantage for them
- Accept a gift or hospitality from a third party if you know or suspect that it is offered or provided with an expectation that a business advantage will be provided by us in return
- Threaten or retaliate against another worker who has refused to commit a bribery offence or who has raised concerns under this policy
- Engage in any activity that might lead to a breach of this policy

Facilitation payments may be experienced where a Service User, relative or other agent offers a payment to obtain a level of service for a Service User that would not normally be provided. Our absolute policy is that such payments are not to be accepted and should be reported to Criss Watts.

During any form of tendering process, gifts and hospitality (even if proportionate) must not be accepted and, if offered, should be politely declined and referred to Criss Watts.

Reasonable and proportionate gifts as a token of appreciation or as part of facilitating normal business relationships are acceptable; the key is that they must not be an inducement to act improperly.

Genuine hospitality or other similar business expenditure that is reasonable and proportionate, is not prohibited under the Act. All hospitality must, however, be bona fide.

Charitable support and donations are acceptable under law. This includes services in kind, knowledge sharing, time offered or direct financial contributions. However, UCP's staff must be careful to ensure that charitable contributions are not used as a cover to conceal bribery. Only make charitable donations that are legal and ethical.

In the first instance, staff and others that this policy is relevant for should notify Criss Watts if it is suspected that a breach of this policy has occurred.

Any situation should be avoided where personal benefit may arise from decisions taken. If there is any doubt, you should report to Criss Watts.

If the Director is suspected of being in breach of the Bribery Act 2010 then the alerter should contact the Responsible Individual for the service, or if that is not practical or appropriate the police should be contacted.

In any situation where Criss Watts may be compromised by a conflict of interest or possible personal benefit that may conflict with the Bribery Act 2010, the Company Secretary, owner or equivalent must be informed.



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The Whistleblowing Policy and Procedure is also relevant and will be used to cover situations when the organisation may have been alerted of possible breaches of the Bribery Act 2010.

If an individual is an employee of UCP Group Ltd and is in breach of this policy, then the service may take disciplinary action (including possibly dismissal for Gross Misconduct) against the person concerned.

If the person is not an employee, the person's contract with the service may be terminated without notice as appropriate.

Individuals can also be punished by up to ten years imprisonment and a fine if found to be in breach of the Bribery Act 2010.

This policy does not form part of an employee's contract of employment and we may amend it at any time.