



Medical Rescue Training

Anti-Bribery & Corruption Policy - Square Knot Ltd

Responsible Person: Jacob Leverett (Director)

Applies to: All staff, contractors, volunteers, and associates

Review Date: Annual or following legislative/regulatory change

Policy Location: <https://square-knot.co.uk/policies>

1. Purpose

Square Knot Ltd is committed to conducting all business with honesty, integrity, and transparency.

The purpose of this policy is to:

- Prevent bribery and corruption in all activities
- Ensure compliance with the **Bribery Act 2010**
- Protect the organisation, staff, and service users from unethical practices
- Provide clear procedures for identifying and managing bribery risks

Under the Bribery Act 2010, organisations may be liable for failing to prevent bribery unless adequate procedures are in place.

2. Scope

This policy applies to:

- All employees (permanent, temporary, agency)
- Clinical and non-clinical staff
- Event medical personnel
- Contractors, suppliers, and subcontractors
- Anyone acting on behalf of Square Knot Ltd

It applies to:

- All business activities (including event contracts and training provision)
- Procurement and supplier relationships
- Interactions with clients, public bodies, and partners

3. Legal Framework

This policy is aligned with:

- Bribery Act 2010
- Fraud Act 2006
- Proceeds of Crime Act 2002
- CQC Fundamental Standards

Failure to comply may result in:

- Criminal liability for individuals
- Corporate prosecution
- Disqualification from public sector contracts

4. Definitions

- **Bribery:** Offering, promising, giving, or receiving something of value to influence a decision
- **Corruption:** Abuse of power for personal gain
- **Facilitation payments:** Unofficial payments to secure routine services (illegal in the UK)
- **Gifts and hospitality:** Items or benefits offered or received in a business context

5. Policy Statement

Square Knot Ltd operates a zero-tolerance approach to bribery and corruption.

We will:

- Prohibit all forms of bribery
- Ensure transparent and ethical business practices
- Maintain effective systems to prevent bribery
- Investigate all concerns promptly
- Take disciplinary and legal action where necessary

6. Responsibilities

6.1 Director (Responsible Person – Jacob Leverett)

- Overall accountability for anti-bribery compliance
- Ensuring adequate procedures are implemented
- Reviewing risks and incidents
- Reporting serious matters to authorities

6.2 Managers

- Ensure staff understand and comply with policy
- Monitor activities for risk
- Escalate concerns

6.3 All Staff

- Must not engage in bribery
- Must report concerns immediately
- Must comply with gifts and hospitality rules

7. Prohibited Conduct

The following are strictly prohibited:

- Offering or accepting bribes
- Making facilitation payments
- Offering inducements to secure contracts
- Accepting benefits that influence decision-making
- Concealing bribery or corruption

This applies regardless of:

- Value
- Location (UK or overseas)
- Whether conduct is “customary” locally

8. Gifts and Hospitality

Gifts and hospitality must:

- Be reasonable and proportionate
- Not influence (or appear to influence) decisions
- Be transparent and recorded

Acceptable Examples:

- Low-value promotional items
- Modest hospitality linked to legitimate business

Unacceptable Examples:

- Cash or cash equivalents
- High-value gifts
- Hospitality linked to contract decisions

9. Procurement and Third Parties

Square Knot Ltd will:

- Conduct due diligence on suppliers and partners
- Include anti-bribery clauses in contracts
- Avoid working with organisations engaged in unethical practices

High-risk areas include:

- Subcontracted medical services
- Equipment procurement

- Public sector contracts

10. Risk Assessment

Regular risk assessments will consider:

- Nature of services (event medical, training, public contracts)
- Geographic risk
- Financial transactions
- Third-party relationships

11. Reporting Concerns

All staff must report suspected bribery via:

- Line Manager
- Director (Jacob Leverett)
- Whistleblowing Policy procedures

12. Investigation Process

All reports will:

- Be taken seriously
- Be investigated promptly and fairly
- Maintain confidentiality

Steps include:

1. Initial assessment
2. Formal investigation
3. Outcome and action

13. Record Keeping

Accurate records must be maintained for:

- Financial transactions
- Gifts and hospitality
- Procurement decisions

Records must:

- Be complete and transparent
- Not conceal improper activity
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14. Training and Awareness

All staff must receive:

- Anti-bribery training at induction
- Regular refresher training

Training must cover:

- Recognising bribery risks
- Legal obligations
- Reporting procedures

15. Monitoring, Audit and Governance

Compliance will be monitored through:

- Internal audits
- Financial reviews
- Incident analysis

Findings will be reviewed by:

- Director (Jacob Leverett)

16. Breaches of Policy

Breaches may result in:

- Disciplinary action (up to dismissal)
- Termination of contracts
- Referral to law enforcement

17. Continuous Improvement

Square Knot Ltd will:

- Review risks regularly
- Update procedures
- Learn from incidents

18. Document Control

All policy documents will be version controlled and regularly reviewed.