

## Anti-Bribery Policy

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<b>Version</b>	4
<b>Policy Contact</b>	Matthew Betteridge
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<b>Target Audience</b>	Agency Workers And OC24 Staff
<b>Approved by</b>	OneCall24 Policy Team

It is the policy of OC24 that all staff and Workers conduct business in an honest and transparent way, without the use of corrupt practices or acts of bribery to obtain an unfair advantage.

This is not just a cultural commitment on the part of OC24; bribery is a criminal offence in most countries and corrupt acts expose OC24 and its employees to the risk of prosecution, fines and imprisonment, as well as endangering OC24's reputation.

Bribery is the offer, promise, giving, demanding or acceptance of an advantage as an inducement for an action which is illegal, unethical or a breach of trust, this may involve initiatives such as buying gifts, offering money or tickets to events for private gain. Acts of bribery or corruption are designed to influence the individual and encourage them to act dishonestly. The person being bribed is generally someone who will be able to obtain, retain or direct business. It does not matter whether the act of bribery has already been committed or is being considered.

Effective risk assessment lies at the very core of this policy. All staff must assess the vulnerability of their activities on an ongoing basis and discuss potential vulnerabilities with Directors. Risk assessment pinpoints the specific areas in which we face bribery and corruption risks and allows us to better evaluate and negate these risks and thereby protect ourselves.

Accurate records and financial reporting must be maintained for all activities and for all third party representatives acting on behalf of OC24. False, misleading or inaccurate records of any kind could potentially damage the reputation of the company.

Effective systems of monitoring and control are essential in all organisations and OC24 is no exception. Once bribery and corruption risks have been identified and highlighted through the risk assessment process, we may need to amend procedures to help mitigate these risks on an on-going basis.

Gifts, entertainment and hospitality include the receipt or offer of gifts, meals or tokens of appreciation or gratitude, or invitations to events, functions, or other social gatherings, in matters connected with our business. These activities are acceptable providing they fall within reasonable bounds of value and occurrence. OC24 sets out the limits approved by directors, and the process required to record gifts and hospitality. Nursing and care services are provided in return for agreed fees. Under no circumstances should you seek any other money, gifts, favours, or rewards for services rendered, either for yourself or for any third party. It is not uncommon for a Client, their friend or relative, to offer a voluntary gift as a mark of

appreciation for care they have received. OC24 believes that giving and receiving such gifts is not generally appropriate to the provision of professional care. Wherever possible, any offer of a gift should be politely refused; with an explanation that acceptance would be against OC24 policy. Furthermore, for people holding a PIN number, it should be noted that accepting gifts is a violation of NMC Code of Conduct.

All individuals who work on behalf of OC24 have a responsibility to help detect, prevent and report instances not only of bribery but also of any other suspicious activity or wrongdoing. OC24 is absolutely committed to ensuring that all staff have a safe, reliable and confidential way of reporting suspicious activity. OC24 wants each and every one of its staff and workers to know how they can 'speak up'. If you are concerned that a corrupt act is being considered or carried out, you should report the matter to your line manager in the first instance. If it is not possible to speak to your line manager for some reason, you should contact a Director.

The policy is designed to allow staff, workers and all members to raise, at high level, concerns or information which they believe in good faith provides evidence of malpractice or impropriety. Individuals discovering apparent evidence of malpractice, impropriety or wrongdoing within OC24 should feel able to disclose the information appropriately without fear of reprisal. A disclosure made in good faith which is not confirmed by subsequent investigation will not lead to any action against the person making the disclosure. Individuals making disclosures which are found by subsequent investigation to be malicious and/or vexatious may be subject to disciplinary or other appropriate action.

#### **Review**

This policy statement will be reviewed annually as part of our commitment to upholding professional standards. It may be altered from time to time in the light of legislative changes, operational procedures or other prevailing circumstances.