Anti-Bribery and Corruption Policy

Supportive Bridge Ltd - Policy and Procedure

POLICY AT A GLANCE

- We do not offer, give, ask for or accept bribes, in any form, from anyone, ever.
- Facilitation payments are never made, however small, however normal it may seem locally, and however much it would speed things up.
- Gifts and hospitality are the exception, not the rule. Anything beyond a modest, occasional gift or meal must be declared on the Gifts and Hospitality Register, whoever it is from or to.
- Cash gifts are never accepted from a person we support, their family, or anyone connected with our work, whatever the amount.
- Referral and introduction fees connected with winning business or placing staff must be approved by the Nominated Individual and recorded; undisclosed "kickbacks" are gross misconduct.
- Anyone can raise a concern about bribery or corruption, including about a manager, without fear of reprisal, through our Whistleblowing Policy.

Registered Manager	Iffrah Ishtiaq
Nominated Individual	Iffrah Ishtiaq
Office phone	07448266215
Out-of-hours / on-call number	
Date issued	01-10-2026
Next review date	

1. Purpose

1.1 This policy sets out how Supportive Bridge Ltd ("Supportive Bridge", "we", "us") prevents bribery and corruption in every part of our business, and what we expect of everyone who works for or with us.

1.2 It reflects the Bribery Act 2010, which makes it a criminal offence to offer, promise or give a bribe; to request, agree to receive or accept a bribe; to bribe a foreign public official; and, for an organisation such as ours, to fail to prevent bribery being carried out on our behalf by an employee, worker or other associated person. There is a defence if the organisation can show it had "adequate procedures" in place to prevent bribery - this policy, and the training and checks that sit behind it, are those procedures.

1.3 Bribery and corruption harm the people we support, damage public trust in social care, and can end a person's career and our ability to trade. There is no acceptable level of bribery: this is a zero-tolerance policy.

2. Scope

2.1 Supportive Bridge Ltd operates in two parts: as a staffing agency, supplying care and support workers to care homes, hospitals and other regulated providers under that provider's own policies and supervision; and as a community support service, where our own support workers visit adults and older people in their own homes, including council housing, on morning and evening shifts to help with daily living.

2.2 Supportive Bridge Ltd is not currently registered with the Care Quality Commission (CQC) and does not provide personal care in any circumstances at present. This means no washing, bathing, dressing, toileting, continence care, or assistance with eating, drinking, oral, skin, hair or nail care. Personal care will only be offered once, and if, CQC registration is granted, and this policy will be updated at that point.

2.3 This policy applies to every director, manager, employee, worker, agency or bank worker, and volunteer, and to anyone acting on our behalf, including recruitment consultants, introducers and sub-contractors. It applies in the UK and, if we ever work with an organisation based overseas, applies to that dealing too.

3. What bribery is

3.1 A bribe is anything of value, financial or otherwise, offered, promised or given to try to influence someone to act improperly, or given to reward them for having done so. It does not have to be cash: it can be a gift, hospitality, a job offer, a discount, a donation, or a favour. It does not matter whether the improper act actually happens - offering or requesting a bribe is enough on its own.

3.2 A facilitation payment is a small, often informal, payment made to a public official to speed up or guarantee a routine action they should be carrying out anyway, such as issuing a licence or processing a document. Facilitation payments are bribes under UK law and are never made by anyone acting for Supportive Bridge Ltd, wherever in the world we may be operating.

4. Gifts and hospitality

4.1 Occasional, modest gifts and hospitality that are a normal and appropriate part of doing business - a box of chocolates at Christmas, a working lunch - are not a problem and do not need prior approval. The test is always: is this proportionate, is it transparent, and could it be seen by a reasonable outsider as an attempt to influence a decision?

- any gift or hospitality worth more than £25, or that forms part of a pattern from the same source, must be declared on the Gifts and Hospitality Register at Appendix A, whether given or received;
- cash, or a cash equivalent such as a voucher, is never accepted from a person we support, their family or representative, or from any supplier, contractor or referrer, whatever the amount - this mirrors the rule in our Handling Money and Property Policy;
- gifts or hospitality must never be offered or accepted around the time of a decision they could be seen to influence, such as a tender, a contract renewal, or a recruitment or disciplinary decision;
- if in doubt, decline politely, or check with the Nominated Individual before accepting.

5. People we support and their families

5.1 Support workers are in a position of trust and must never suggest, encourage or accept a gift, loan, inheritance, or favour from a person we support or their family in return for care, attention, or any other advantage. This is covered in full in our Handling Money and Property Policy and our Staff Code of Conduct Policy, and a breach of either is treated as a bribery and corruption matter as well as a safeguarding one.

6. Recruitment, referrals and introductions

6.1 Any payment, discount or benefit connected with introducing a new client, winning a contract, placing a worker, or referring a candidate, must be transparent, proportionate, properly contracted, and approved in advance by the Nominated Individual. An undisclosed payment or benefit made to secure business or a placement, or accepted for making one, is treated as a bribe.

6.2 Staff must never accept a personal payment, gift or benefit from a candidate, client, care home or hospital in exchange for preferential shift allocation, a favourable reference, or being put forward for a role.

7. Political and charitable donations

7.1 Supportive Bridge Ltd does not make donations to political parties. Any charitable donation or sponsorship must be approved by the Nominated Individual, properly recorded, and never made to obtain or reward a business advantage.

8. Third parties and suppliers

8.1 Before working with a new agency, sub-contractor, introducer or supplier, we carry out proportionate checks appropriate to the size of the relationship, and we make clear in our contracts that we expect the same anti-bribery standards from them that we hold ourselves to.

9. Raising a concern

9.1 Anyone who is offered a bribe, asked for one, or becomes aware of suspected bribery or corruption involving Supportive Bridge Ltd, including by a manager or director, must report it straight away to the Nominated Individual or through our Whistleblowing Policy. No one will be disadvantaged for refusing to take part in bribery, even if that refusal costs us business.

10. Breach of this policy

10.1 A breach of this policy is treated as gross misconduct and may result in dismissal, referral to the police, referral to the CQC once we are registered, and referral to any relevant professional or regulatory body. Individuals convicted of bribery offences face unlimited fines and up to ten years' imprisonment.

11. Related policies

- Whistleblowing Policy
- Handling Money and Property Policy
- Staff Code of Conduct Policy
- Conflicts of Interest Policy
- Modern Slavery Statement and Policy

12. Document control

Version	Date	Approved by	Role	Reason
1.0			Nominated Individual	New policy for local authority assurance and CQC registration

APPENDIX A: GIFTS AND HOSPITALITY REGISTER

Complete for any gift or hospitality over £25, or forming a pattern, whether given or received. Keep in the office and review at each supervision and each governance meeting.

Date	Staff member	Given / received	From / to (name, organisation)	Description and approx. value	Declared to	Action / decision

Supportive Bridge Ltd - registered office: Bradford - uncontrolled if printed; the master copy is held in the office policy file.