Medicare People

HEALTHCARE STAFFING

Anti-Bribery, Gifts and Wills Policy

Policy title	Anti-Bribery, Gifts and Wills Policy
Organisation	Medicare People Limited
Service	Healthcare staffing
Policy owner	Managing Director
Version	2.0
Date	01/11/2026
Next review	November 2027

1. Purpose

The purpose of this policy is to outline the rules that everyone at Medicare People must follow to ensure all interactions with clients, suppliers, and others are appropriate, honest, and transparent.

2. Scope

This policy applies to everyone who works for or on behalf of Medicare People: office and management staff, and the nurses, healthcare assistants, support workers and carers we supply to care providers, whether employed, engaged through an umbrella company or self-employed.

3. Responsibilities

- The Managing Director has overall responsibility for this policy and for making sure it is followed and kept up to date.
- Managers and the compliance team make sure staff and workers understand the policy, follow it in practice and get the training and support they need.
- Everyone covered by this policy must follow it and raise any concerns with their manager or the compliance team straight away.

4. Statement

Medicare People's reputation is built on quality service, integrity, honesty, and professionalism. Any actions that could undermine these values are unacceptable.

5. Procedure and Guidance

Unacceptable Behaviour

Bribery involves accepting gifts, money, hospitality, or other favours in exchange for providing something of value to the briber. The following behaviours are unacceptable:

- Accepting any financial or other reward from any person in return for providing a favour.
- Requesting a financial or other reward from any person in return for providing a favour.
- Offering any financial or other reward to any person in return for providing a favour.

Business Gifts

Clients, suppliers, or others may occasionally offer gifts to Medicare People employees. All gifts, regardless of value, must be reported and recorded. No gifts may be accepted. If a gift is refused due to its value, this must be reported. If refusing a gift might cause offense (e.g., it is offered as appreciation for exceptional care), the situation should be discussed with the employee's manager to decide on appropriate action.

Hospitality

Invitations to hospitality events from clients, suppliers, or others must be reported, and permission must be obtained before accepting any invitation.

Attempts to Bribe

Any employee who suspects they are being bribed should report the matter immediately.

Clients' Wills and Bequests

Employees are strictly forbidden from assisting in the making of or benefiting from clients' wills. Employees must refuse to offer any advice on the making of wills or their contents. If a bequest is made to an employee without their prior knowledge, it must be declared. If the company is satisfied that nothing improper has occurred, the bequest may be accepted. Monetary bequests to the company may be used for the benefit of all employees.

Disciplinary Action

Any employee found to have offered or accepted a bribe, or who has violated any standards of conduct outlined in this policy, will face disciplinary action, which could include dismissal for gross misconduct.

Raising Concerns

If an employee is concerned about acts of bribery within the company, they should inform their manager. If this is not appropriate, they should inform the Head of Nursing for Medicare People.

6. Monitoring and review

This policy is reviewed every year, or sooner if legislation, guidance or our services change, or if an incident, complaint or audit shows it needs updating. The review is recorded in the version

history below.

7. Legislation and guidance

- Bribery Act 2010
- Criminal Finances Act 2017

Version history

Version	Summary
1.0	Original policy
2.0	1 November 2026 – restyled to the Medicare People brand, structure standardised, legal references updated