



**EVENT MEDICAL GROUP
&
MERGED EDUCATION**

Ethics Policy Pack



Policy Document

Anti Bribery, Corruption, Fraud, Money Laundering and Gambling Policy



INTRODUCTION

Bribery is, in the conduct of the company's business, the offering or accepting of any gift, loan, payment, reward or advantage for personal gain as an encouragement to do something which is dishonest, illegal or a breach of trust.

Bribery is a criminal offence. The Company prohibits any form of bribery. We require compliance, from everyone connected with our business, with the highest ethical standards and anti-bribery laws applicable. Integrity and transparency are of utmost importance to us and we have a zero tolerance attitude towards corrupt activities of any kind, whether committed by Event Medical Group (EMG) Limited employees or by third parties acting for or on behalf of Event Medical Group (EMG) Limited.

OFFENCES

It is a criminal offence to:

- offer a bribe;
- accept a bribe;
- bribe a foreign official;
- as a commercial organisation, to fail to prevent a bribe.

You should be aware that if you are found guilty by a court of committing bribery, you could face up to 10 years in prison and/or an unlimited fine. The Company could also face prosecution and be liable to pay a fine.

PURPOSE

The purpose of this policy is to convey to all employees and interested parties of Event Medical Group (EMG) Limited the rules of the Company in relation to our unequivocal stance towards the eradication of bribery and our commitment to ensuring that Event Medical Group (EMG) Limited conducts its business in a fair, professional and legal manner.

DEFINITIONS OF BRIBERY AND CORRUPTION

Corruption is the misuse of office or power for private gain. Bribery is a form of corruption which means in the course of business:

- Giving or receiving money, gifts, meals, entertainment or anything else of value.
- As an inducement to a person to do something which is dishonest or illegal.

SCOPE

This policy applies to all employees of Event Medical Group (EMG) Limited, regardless of seniority or site. It also extends to anyone working for or on our behalf e.g. those engaged by us on a self-employed basis or an agency arrangement.

We will encourage the application of this policy where our business involves the use of third parties e.g. suppliers; contractors.



POLICY

It is prohibited, directly or indirectly, to offer, give, request or accept any bribe i.e. gift, loan, payment, reward or advantage, either in cash or any other form of inducement, to or from any person or company in order to gain commercial, contractual or regulatory advantage for the Company, or in order to gain any personal advantage for an individual or anyone connected with the individual in a way that is unethical.

It is also prohibited to act in the above manner in order to influence an individual in their capacity as a foreign public official. You should not make a payment to a third party on behalf of a foreign public official.

If you are offered a bribe, or a bribe is solicited from you, you should not agree to it unless your immediate safety is in jeopardy. You should immediately contact a Senior Manager so that action can be taken if considered necessary. You may be asked to give a written account of events.

If you, as an employee or person working on our behalf, suspect that an act of bribery, or attempted bribery, has taken place, even if you are not personally involved, you are expected to report this to a Senior Manager. You may be asked to give a written account of events.

Appropriate checks will be made before engaging with suppliers or other third parties of any kind to reduce the risk of our business partners breaching our anti-bribery rules.

The Company will ensure that all of its transactions, including any sponsorship or donations given to charity, are made transparently and legitimately.

Event Medical Group (EMG) Limited takes any actual or suspected breach of this policy extremely seriously and will carry out a thorough investigation should any instances arise.

We will uphold laws relating to bribery and will take disciplinary action against any employee, or other relevant action against persons working on our behalf or in connection with us, should we find that an act of bribery, or attempted bribery, has taken place. This action may result in your dismissal if you are an employee, or the cessation of our arrangement with you if you are self-employed, an agency worker, contractor etc.

Staff are reminded of the Company's Whistleblowing Policy which is available in the Employee Handbook, or upon request.

FRAUD

Fraud is defined as wrongful or criminal deception intended to result in financial or personal gain

Fraud is not tolerated in Event Medical Group (EMG) Limited.

Any attempt to secure an unlawful gain will lead to disciplinary action and sanctions up to and including dismissal. A report will also be made to the relevant authority which could lead to prosecution.

Event Medical Group (EMG) Limited will always seek to recover loss resulting from fraud.



GIFTS AND HOSPITALITY

We realise that the giving and receiving of gifts and hospitality where nothing is expected in return helps form positive relationships with third parties where it is proportionate and properly recorded. This does not constitute bribery and consequently such actions are not considered a breach of this policy.

Gifts include money; goods (flowers, vouchers, food, drink, event tickets when not used in a hosted business context); services or loans given or received as a mark of friendship or appreciation.

Hospitality includes entertaining; meals or event tickets (when used in a hosted business context) given or received to initiate or develop relations. Hospitality will become a gift if the host is not present.

No gift should be given nor hospitality offered by an employee or anyone working on our behalf to any party in connection with our business without receiving prior written approval from a Senior Manager. Similarly, no gift nor offer of hospitality should be accepted by an employee or anyone working on our behalf without receiving prior written approval from a Senior Manager.

A record will be made of every instance in which gifts or hospitality are given or received.

As the law is constantly changing, this policy is subject to review and the Company reserves the right to amend this policy without prior notice.

MONEY LAUNDERING

Money Laundering is the concealment of the origins of illegally obtained money, typically by means of transfers involving foreign banks or legitimate businesses.

We expect all staff to remain vigilant with regards to complying Money Laundering Regulations. We expect that if any activity arouses an employees' suspicion should be reported immediately to a member of management. Any employee who fails to report any suspicious activity may have disciplinary proceedings taken against them.

GAMBLING

Gambling is defined as the activity of playing games of chance for money, or of betting on the outcome of future events such as the result of the races or games.

Gambling is strictly forbidden within Event Medical Group (EMG) Limited, any employee found to be gambling within the business will be subject to disciplinary action and the company will seek to recoup any financial loss gained through the individuals gambling.



Policy Document

Anti-Slavery Policy



INTRODUCTION

Event Medical Group (EMG) Limited is committed to ensuring that all its business operations are free from involvement with slavery or human trafficking.

Annual statement

Although Event Medical Group (EMG) Limited does not meet the requirements of the Modern Slavery Act 2015 that would legally require Event Medical Group (EMG) Limited to produce a slavery and human trafficking statement, we recognise the importance of preventing modern slavery and therefore we will voluntarily produce an annual slavery and human trafficking statement. A link to this statement will be on the homepage of our website and will be signed and approved by a Director. The Directors are responsible for ensuring that this statement is published and reviewed on an annual basis. The statement will explain the steps that Event Medical Group (EMG) Limited has taken to ensure that slavery and trafficking are not taking place in any of its supply chains, or in any part of its own business.

CONTENT OF THE STATEMENT

The following items will be included in the statement.

- 1) The structure of our organisation, the business operations of the organisation and the supply chains.
- 2) Our policies in relation to slavery and human trafficking.
- 3) The due diligence processes that we carry out to ensure that there is no slavery or human trafficking in our business and supply chains.
- 4) Identification of any parts of our business and supply chains where there is a risk of slavery or human trafficking taking place, and the steps that we have taken to assess and manage the risk.
- 5) An assessment of the effectiveness of the measures that we have taken to stop slavery and human trafficking taking place, and the way that we assess and manage the risks that are identified.
- 6) A statement that training about slavery and human trafficking is available to all employees.

ADDITIONAL ACTION POINTS

In addition to producing the annual statement, Event Medical Group (EMG) Limited is committed to:

- ensuring that slavery and human trafficking is considered and addressed in our approach to corporate social responsibility
- ensuring that any concerns about slavery or human trafficking can be raised through our whistleblowing procedure
- carrying out regular audits to ensure that all our employees are paid at least the National Minimum Wage and have the right to work in the UK
- ensuring that all commercial agreements include an obligation on our suppliers to operate in accordance with the Modern Slavery Act 2015, and to ensure that any of their suppliers and sub-contractors also operate in accordance with the Act
- appointing a named individual to oversee the compliance with the Modern Slavery Act 2015
- identifying and addressing any areas of high risk in our supply chain
- providing training for all employees who are involved in the supply chain on issues relating to slavery and human trafficking.



Policy Document

Modern Slavery Statement



INTRODUCTION

Modern slavery encompasses slavery, servitude, human trafficking, and forced labour. Event Medical Group Ltd and Merged Education Ltd have a zero-tolerance approach to any form of modern slavery. We are committed to acting ethically, with integrity and transparency in all business dealings, and to putting effective systems and controls in place to safeguard against any form of modern slavery taking place within the business or our supply chains.

POLICY STATEMENT

This statement is made pursuant to section 54 of the Modern Slavery Act 2015 and sets out the steps that Event Medical Group Ltd and Merged Education Ltd have taken, and are continuing to take, to ensure that modern slavery or human trafficking is not taking place within our businesses or supply chains during the year ending 31 March 2025.

EVENT MEDICAL GROUP LTD

Event Medical Group Ltd provides specialist medical services for events of all sizes, ensuring the safety and wellbeing of participants and attendees. We employ over 80 staff who operate across various event locations nationwide. Our services include on-site medical care and emergency response.

MERGED EDUCATION LTD

Merged Education Ltd offers comprehensive educational services and resources, catering to a diverse population of students and educators. With a small workforce of 10 employees operating across multiple educational institutions such as colleges and business to business sales, we deliver a wide range of educational programs, from First aid, manual handling to health and safety such as NEBOSH courses.

SCOPE

All Staff members and suppliers.

OUR POLICIES ON SLAVERY AND HUMAN TRAFFICKING

Event Medical Group Ltd and Merged Education Ltd are aware of our responsibilities towards our clients, employees, and the communities we serve. We expect all suppliers to adhere to the same ethical principles. We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business. Our internal policies replicate our commitment to acting ethically and with integrity in all our business relationships.

Currently, all awarded suppliers sign up to our terms and conditions of contract, which contain a provision around Good Industry Practice to ensure each supplier's commitment to anti-slavery and human trafficking in their supply chains and that they conduct their businesses in a manner that is consistent with our anti-slavery policy. Additionally, an increasing number of suppliers are implementing the Labour Standards Assurance System (LSAS) as a condition of contract for tenders within high-risk sectors and product categories. Many aspects of the LSAS align with the seven reporting areas that the Government has outlined and should appear within any slavery and human trafficking statement.



OUR INTERNAL POLICIES

We operate a number of internal policies to ensure that we are conducting business in an ethical and transparent manner. These include:

1. Recruitment Policy: We operate a robust recruitment policy, including conducting eligibility to work in the UK checks for all directly employed staff. Agencies on approved frameworks are audited to provide assurance that pre-employment clearance has been obtained for agency staff to safeguard against human trafficking or individuals being forced to work against their will.
2. Equal Opportunities: We have a range of controls to protect staff from poor treatment and/or exploitation, which comply with all respective laws and regulations. These include provision of fair pay rates, fair terms and conditions of employment, and access to training and development opportunities.
3. Safeguarding Policies: We adhere to the principles inherent within both our safeguarding children and adults policies. These are compliant with multiagency agreements and provide clear guidance so that our employees are clear on how to raise safeguarding concerns about how colleagues or people receiving our services are being treated, or about practices within our business or supply chain.
4. Whistleblowing Policy: We operate a whistleblowing policy so that all employees know that they can raise concerns about how colleagues or people receiving our services are being treated, or about practices within our business or supply chain, without fear of reprisals.
5. Standards of Business Conduct: This code explains the manner in which we behave as an organisation and how we expect our employees and suppliers to act.

OUR APPROACH TO PROCUREMENT AND OUR SUPPLY CHAIN

- Ensuring that our suppliers are carefully selected through our robust supplier selection criteria/processes.
- Requiring that the main contractor provides details of its sub-contractor(s) to enable us to check their credentials.
- Randomly requesting that the main contractor provide details of its supply chain.
- Ensuring invitation to tender documents contain a clause on human rights issues.
- Ensuring invitation to tender documents also contain clauses giving us the right to terminate a contract for failure to comply with labour laws.
- Using the standard Supplier Selection Questionnaire (SQ) that has been introduced (which includes a section on Modern Day Slavery).

Our staff must contact and work with the Procurement department when looking to work with new suppliers so appropriate checks can be undertaken.



SUPPLIER ADHERENCE TO OUR VALUES

We are zero-tolerant to slavery and human trafficking and thereby expect all our direct and indirect suppliers/contractors to follow suit. Where it is verified that a subcontractor has breached the child labour laws or human trafficking, this subcontractor will be excluded in accordance with Regulation 57 of the Public Contracts Regulations 2015. We will require that the main contractor substitute a new subcontractor.

TRAINING

Advice and training about modern slavery and human trafficking are available to staff through our mandatory safeguarding training programs, our safeguarding policies and procedures, and our safeguarding leads. It is also discussed at our compulsory staff induction training. We are looking at ways to continuously increase awareness within our organisation, and to ensure a high level of understanding of the risks involved with modern slavery and human trafficking in our supply chains and in our business.

OUR PERFORMANCE INDICATORS

We will know the effectiveness of the steps that we are taking to ensure that slavery and/or human trafficking are not taking place within our business or supply chain if:

- No reports are received from our staff, the public, or law enforcement agencies to indicate that modern slavery practices have been identified.

Event Medical Group Ltd and Merged Education Ltd remain committed to tackling modern slavery and human trafficking and will continue to review and improve our policies and practices in this area.



Policy Document

Labour Standards Policy



INTRODUCTION

This policy sets out the Organisation's commitment to ensuring that minimum labour standards are upheld, maintained and where possible, exceeded.

This policy applies to all staff, officers, volunteers, contractors, sub-contractors and suppliers.

Where appropriate, we will choose to work with suppliers with high labour and ethical standards.

CHILD LABOUR

We will not condone or support the use of child labour. The Organisation will ensure that all relevant legislation and restrictions are adhered to in regards to the use of young workers, including restrictions on working hours. We will ensure that the necessary checks are carried out to verify an individual's age and right to work, and that relevant Health and Safety legislation is adhered to, including carrying out risk assessments when required.

WORKING TIME

The Working Time Regulations 1998 govern requirements for working time and leave which the Organisation abides by.

The Working Time Regulations 1998 provide that the average working week, including overtime, shall not exceed 48 hours. Employees can choose to work more than the average of 48 hours a week by signing a written agreement known as the '48 hour opt out agreement'. This agreement is available separately.

We always ensure that our staff are paid above national minimum wage and we ensure that all relevant tax and national insurance contributions are made as required.

HEALTH AND SAFETY

Employees should make themselves familiar with our Health and Safety Policy and their own health and safety duties and responsibilities in accordance with the Health and Safety at Work Act 1974 and any other relevant health and safety legislation.

The Organisation adheres to its obligations as follows:

- Risk assessments are carried out as required
- The appointment of a competent person to evaluate hazards
- Employees are informed of risks and measures taken to ensure their safety
- There is an up-to-date Health and Safety Policy available to all employees
- Appointed Health and Safety representatives
- The monitoring of risks and safety arrangements
- Established emergency procedures
- Safety information is provided
- Training is provided
- Employers' liability insurance is provided
- Reporting procedures for accidents are in place
- Reporting procedures for diseases at work are in place



All staff have access to clean drinking water and toilet facilities.

FREEDOM OF ASSOCIATION AND THE RIGHT TO COLLECTIVE BARGAINING

In accordance with the Human Rights Act 1998 article 11, people have the right to assembly and association:

Everyone has the right to freedom of peaceful assembly and the freedom to associate with others: this includes the right to form and join Trade Unions.

No restrictions shall apply to the exercises of these rights other than those prescribed by the law and those necessary in a democratic society in the interests of national security or public safety, for the prevention of crime or the protection of health, morals and the rights and freedoms of others.

EQUALITY AND DIVERSITY

We are an equal opportunities employer. We are committed to equality of opportunity and to providing a service and following practices which are free from unfair and unlawful discrimination. We will ensure that no applicant or member of staff receives less favourable treatment on the grounds of age, disability, gender reassignment, marriage and civil partnership, pregnancy or maternity, race, religion or belief, sex or sexual orientation, or is disadvantaged by conditions or requirements which cannot be shown to be relevant to performance. We seek also to ensure that no person is victimised or subjected to any form of bullying or harassment. For further information please refer to the Organisation's full Equality, Diversity and Equity Policy.

DISCIPLINARY PROCEDURE

Any disciplinary matters will be handled under our Disciplinary Procedure. All staff will be treated with dignity and respect during this process, and at all other times. No one shall be subjected to cruel, inhuman or degrading treatment.

NATIONAL MINIMUM WAGE

There is statutory minimum pay requirements as set out by the government under National Minimum Wage (NMW) legislation. Employees and workers must receive payslips, separately identifying payments and deductions. The Equality Act 2010 also sets out requirements for equal pay. The Organisation abides by these requirements and legislation.

MODERN SLAVERY AND FORCED LABOUR

We will not condone or support the use of modern slavery, human trafficking or forced labour in any circumstances. Employees are entitled to leave our employment of their own free will after giving the notice required in their Statement of Main Terms of Employment.



Policy Document

Prevent Duty (Counter – Terrorism)



INTRODUCTION

This policy is written in line with the UK government's statutory guidance issued under the Counter-Terrorism and Security Act 2015 and national and local strategies, including for safeguarding. It should be used with reference to the policy, Safeguarding Service Users Who Are Vulnerable to Adopting Extremist and Radical Ideologies.

This care service is committed to the UK Government's policy to reduce the risk of terrorist attacks (known as CONTEST) through its Prevent strategy, particularly in the light of attacks that have cost many lives. It understands that government policy is based on four main assumptions.

1. Prevent — by stopping people becoming terrorists or supporting terrorism.
2. Protect — by strengthening borders, infrastructure and public spaces from any attacks.
3. Prepare — by responding effectively to reduce the impact of any attack.
4. Pursue — to disrupt or stop terrorist attacks.

The care service will help in whatever ways it can to achieve the government's objectives, which as stated in its guidance issued April 2019 are:

- to respond to the ideological challenge of terrorism and the threat faced from those who promote it
- to prevent people from being drawn into terrorism and ensure that they are given appropriate advice and support
- to work with sectors and institutions where there are risks of radicalisation that should be addressed.

The care service thus aims to put Prevent in practice through the following.

- Challenging violent extremist ideology and support for it.
- Disrupting those who promote violent extremism and in the places where they may be active.
- Supporting individuals who are being targeted and recruited to the cause of violent extremism.
- Increasing the resilience of the service as a whole to withstanding radicalisation and extremism particularly where the risks are relatively high.
- Addressing the political, religious, social, cultural and economic grievances that are being exploited through the extremist ideology and behaviour.



BACKGROUND

The care service understands “terrorism” and “terrorists” to refer to the definitions found in the Counter-Terrorism and Security Act 2015 .

As in the health care sector generally, it is the Prevent element with which a care service is mainly concerned in line with its other safeguarding responsibilities and duty of care.

Accordingly, this care service understands the Prevent element of the wider strategy requires it to identify and respond to any of its service users who appear to be at risk of supporting or taking part in terrorist acts as defined in the Government’s strategy guidance. The need for vigilance is required because it is known that vulnerable people are often targeted by terrorist groups and organisations for the purposes of radicalisation and potential participation in terrorist activities.

By “identification” is meant becoming aware of and recognising when individuals or groups of vulnerable people receiving our services are at risk of being or have been radicalised into an ideology that achieves its ends through terrorist acts.

By “responding” is meant the safeguarding of that individual or group from further exposure to the risk of radicalisation and possible taking part in terrorist acts.

“Responding” includes the reporting of any concerns about anyone who is expressing a close interest in terrorist thinking and activities and anyone who is suspected of having been radicalised and who might be taking part in illegal acts.

PROCEDURES

Identification

All staff as a result of understanding this policy and training need to recognise when any vulnerable individual or group might be exploited by other individuals or groups for the purpose of involving them in terrorist acts. They also need to become aware if any individual or group is becoming exposed to material or influences that place them at risk of exploitation or actively taking part in terrorist acts. Sources of exposure include membership of institutions that are known to promote terrorist thinking and radicalisation (including self-radicalisation), social networks and the internet including social media.

Responding

Staff are expected to report to their line manager (and/or designated safeguarding manager) any concerns and information indicating that a vulnerable individual or group is being exposed to harmful influences that could result in their taking part in terrorist acts or suspicions or evidence that they are taking part in terrorist acts.

The manager will then assess the situation, which will include assessing the risks of any escalation of the terrorist threats posed by the individual or group. The outcome of this assessment will decide the course of action that follows. The aim will be to prevent and protect service users from being caught up in terrorist activities so that they do not suffer significant harm and expose others to significant harm.



Examples

Where the concerns and risks are relatively small or the situation is in the early stages, the outcome might well be reflected in adjustments to the individual's service plan to divert or minimise further exposure or contact, eg by providing advice, monitoring or controlling access to harmful information on the internet.

Where there is evidence that the individual is at more serious risk of being harmed as a result of exposure or contact to radicalisation (or self-radicalisation) the appropriate action will be to inform the local safeguarding adults board and following its procedures so that further assessment and an appropriate protection plan can be put into place.

Where there is evidence that the individual/group has already engaged in illegal terrorist activities or is about to do so, thereby posing a risk to public safety, the police will be immediately informed (together with/ followed by notification to the safeguarding adults authority and care regulator).

In taking any action to prevent, divert or formally report the activities of its service users who are at risk of radicalisation or are suspected of taking part in activities that could result in terrorism, the service is mindful of the need to protect service users' freedoms and human rights of individuals to think and act independently within the law.

The service recognises the importance of involving the person or persons in its actions and (in other than possibly the reporting of illegal acts) obtaining their consent to any proposed course of action designed to keep them safe from further harm in these respects. Individuals who might lack the mental capacity to take their own decisions in respect of being exposed to or having contact with harmful influences, which might lead them into terrorism, are made subject to best interests assessments and decisions in line with mental capacity / incapacity law.

TRAINING

The service is committed to making sure that all staff have the competences to identify and report behaviour that puts an individual service user at risk of radicalisation and becoming a terrorist. It seeks to do this by key staff taking part in locally available Department of Health Approved Health Workshops to Raise Awareness of Prevent (WRAP) events, which can be cascaded down to other staff and included where relevant into their general safeguarding training (including induction training).