Karen Blake Coaching Ltd
Anti-Bribery and Corruption Policy
Policy Code: COM 001
Review Date: June 2025

1. Policy Statement

Karen Blake Coaching Ltd ("KBC") is committed to conducting its business in an ethical, honest and transparent manner. KBC operates a strict zero-tolerance approach to bribery and corruption and is committed to preventing bribery and ensuring compliance with all applicable laws, including the **UK Bribery Act 2010**.

KBC recognises that engaging in bribery or corruption may result in serious consequences including criminal penalties, financial penalties, exclusion from public contracts, and reputational damage.

2. Applicability

This policy applies to:

- All employees, contractors, freelance associates, tutors, assessors, quality assurers, partners, subcontractors, volunteers, agency workers, suppliers, and other third parties working with KBC.
- Any organisation or individual acting on behalf of KBC.
- All business activities, contracts, and dealings undertaken by KBC in the UK and internationally.

3. Proportionate Risk

KBC operates as a micro-business providing training, coaching and assessment services. As such, the nature of our work presents a low risk of bribery or corruption. Nevertheless, this policy ensures robust safeguards are in place to prevent, detect, and address any potential instances of bribery.

4. Definitions

Bribery is the offering, promising, giving, accepting or soliciting of an advantage as an inducement for action which is illegal, unethical, or a breach of trust.

Facilitation payments and **kickbacks** are illegal under UK law and are prohibited under this policy.

Third parties include clients, suppliers, government officials, awarding bodies, funders, subcontractors, and others with whom KBC has business dealings.

5. Gifts, Hospitality & Benefits

- Modest, reasonable business gifts and hospitality are permitted, provided they:
  - Are not intended to influence business decisions.
  - Are of low value (typically under £100).
  - Are transparent and properly recorded.
  - Do not involve government officials without prior approval.
- Any gift or hospitality that falls outside these guidelines must be approved by the Director (Karen Blake).
- Any doubts about acceptability should be referred to the Director before acceptance.

6. Political Contributions

KBC does not make political donations of any kind.

7. Charitable Donations

- Charitable donations may only be made with approval of the Director.
- Donations must not be used to improperly influence business decisions or gain unfair advantage.

8. Responsibilities

- All staff and third parties acting on KBC's behalf have a duty to comply with this policy.
- Any suspected breach must be reported immediately to the Director.
- The Director (Karen Blake) is responsible for overseeing implementation and monitoring of this policy.

9. Reporting Concerns

- Employees and contractors are encouraged to report any concerns, suspicions or incidents via KBC's **Whistleblowing Policy (HSD 010)**.
- No person will suffer retaliation for raising concerns in good faith.

10. Training & Awareness

- Anti-bribery training forms part of staff induction and ongoing compliance awareness.
- The Director will review training needs regularly to ensure all staff remain aware of their obligations.

11. Record Keeping

- Accurate financial records are maintained for all transactions.
- Gifts and hospitality are recorded where applicable.
- All business activities must be transparent and open to audit.

12. Monitoring & Review

- This policy is reviewed annually or sooner if legislation changes.
- The Director is responsible for regular review and ensuring ongoing compliance.

Signed:
Karen Blake
Director, Karen Blake Coaching Ltd
Date: June 2025