

Date Issued	January 2012
Date Reviewed	November 2021
Department	Corporate
Title	Anti-Bribery and Corruption Policy
Objective	To set out the rules on anti-bribery and corruption matters for staff and Management Committee/Board members.
Responsible	Chief Executive
Next Review Date	November 2026

1.0 Purpose

The purpose of this policy is to:

- Set out the Group's responsibilities, and the responsibilities of those working for us or associated with us, in observing and upholding our position on bribery and corruption
- Provide information and guidance to those working for us on how to recognise and deal with bribery and corruption issues

2.0 Our Principles

2.1 We are committed to the prevention, deterrence and detection of bribery and corruption and maintaining a culture in which this is never acceptable.

Our Principles are:

- To conduct all of our business in an honest and ethical manner. We take a zero tolerance approach to bribery and corruption and are committed to acting professionally, fairly and with integrity in all our business dealings and relationships wherever we operate
- To expect everyone that we do business with take a similar zero-tolerance approach to bribery and corruption
- To comply with all laws relevant to countering bribery and corruption

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- To be clear that bribery and corruption are criminal offences and are punishable for individuals by up to ten years' imprisonment and an unlimited fine, and if the Group is found to have taken part in corruption we could face an unlimited fine, be excluded from tendering for contracts and face damage to our reputation. We therefore take our legal responsibilities very seriously and expect staff to do the same

2.2 Compliance with the Group's policy in relation to bribery and corruption is relevant to all contracts and relationships with the Group. If employees fail for any reason to follow the rules set out in this document this may result in disciplinary action being taken which could result in dismissal.

3.0 Bribery

This is the offer or receipt of any gift, loan, payment, reward or other advantage to or from any person as an encouragement to do something which is dishonest, illegal or a breach of trust, in the conduct of the Group's business.

3.1 Blackmail

This is the action of someone who demands money or other favours from an individual by using threats or the manipulation of their feelings in return for not revealing compromising information which they hold about that individual. (e.g. if a staff member has a relationship with a tenant/contractor etc. who uses the situation to blackmail a member of staff or vice versa).

An act of this nature should be treated as though it were an act of Bribery.

4.0 Corruption

This is the misuse of entrusted power for private gain.

5.0 Relevant Persons

This policy applies to all individuals working at all levels and grades within the ELHA Group, Management Committee members / Board members, employees (whether permanent, fixed-term or temporary), consultants, contractors, casual workers, agency staff, agents, or any other person associated with us.

6.0 What it means for you – a brief overview

- It is an offence to bribe another person, to be bribed and for the Group to fail to prevent bribery (Bribery Act 2010)

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- You must never offer, promise or give a financial or other advantage to any person with the intention of inducing or rewarding improper performance by them of their duties
- You must never directly or indirectly accept or agree to receive a financial or other advantage as a reward for the improper performance of your duties. It makes no difference whether the advantage is for you or a third party
- Where your role requires this, you are permitted to give and receive gifts and hospitality, but this should always be in a reasonable and proportionate manner. For more details, see our Gifts and Hospitality Policy

7.0 Your responsibilities

- You must ensure that you read, understand and comply with this policy at all times
- You must be open about gifts and hospitality given or received and record them in the Gifts and Hospitality Register
- The prevention, detection and reporting of bribery and other forms of corruption are the responsibility of all those working for us or under our control. All relevant persons are required to avoid any activity that might lead to, or suggest, a breach of this policy
- You must notify your line manager/Executive Officer as soon as possible if you believe or suspect that a conflict with this policy has occurred, or may occur in the future. For example, if a customer or potential customer offers you something to gain a business advantage with us, or indicates to you that a gift or payment is required to secure their business. Another example may be a service user attempting to bribe a member of staff in order to fraudulently receive an offer of housing or some other service provided by us
- You must assess your job activities and discuss any potential vulnerabilities or risks with your line manager
- You must ensure that any records you keep are accurate and up to date
- Any employee who breaches this policy may face disciplinary action, which could result in dismissal for gross misconduct

8.0 How to Raise a Concern

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- 8.1 We are committed to ensuring that we have a safe, reliable, and confidential way of reporting any suspicious activity. You are encouraged to raise concerns about any issue or suspicion of malpractice at the earliest possible stage by following our Anti-Bribery and Corruption Procedure

9.0 Protection

- 9.1 We understand that you may be worried about possible repercussions if you refuse to accept or offer a bribe, or raise or report another's wrongdoing.
- 9.2 We aim to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken.
- 9.3 We are committed to ensuring nobody suffers detrimental treatment through refusing to take part in bribery or corruption, or because of reporting a concern in good faith.

10.0 Contractor and Consultant

- 10.1 We expect all contractors and consultants to comply with this policy
- 10.2 If a contractor or consultant becomes aware of any breach of this policy, they must notify the Chief Executive immediately.
- 10.3 We will take action against any Contractor or Consultant who attempts to commit an offence under the Bribery Act 2010.

11.0 Training

- 11.1 Training on this policy forms part of the induction process for all new staff. All existing staff will receive regular, relevant training on how to implement and adhere to this policy.
- 11.2 Our zero-tolerance approach to bribery and corruption must be communicated to all suppliers, contractors and business partners at the outset of our business relationship with them and as appropriate thereafter.

12.0 Monitor and Review

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- 12.1 We will maintain a Bribery and Corruption Register which will record all acts of Bribery and Corruption (whether conclusive or inconclusive).
- 12.2 All acts of bribery and corruption will be reported to the Management Committee.
- 12.3 We will monitor the effectiveness and review the implementation of this policy, regularly considering its suitability, adequacy and effectiveness.
- 12.4 The Chief Executive will ensure that this policy is reviewed at least every five years by the Management Committee.