

# **Anti Fraud, Bribery, Theft and Corruption Policy**

# Anti Fraud, Bribery, Theft and Corruption Policy



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# Anti Fraud, Bribery, Theft and Corruption Policy



## 1 Policy information

|                      |                                 |
|----------------------|---------------------------------|
| Date of issue        | July 2023                       |
| Replacing/Updating   | Fraud Policy and Bribery Policy |
| Review Date          | July 2026                       |
| Drafted by           | Kayleigh Adams/Sarah Bunting    |
| Contributors         | Executive Leadership Team       |
| Responsible Director | Chief Executive                 |

## 2 Policy Statement

South Liverpool Homes (SLH) is committed to eliminating fraud, bribery, theft and corruption and achieving the highest standards of good governance in all its activities. This policy supports that commitment and aims to prevent, detect, investigate and report any internal and external fraud, theft, bribery or corruption and take appropriate action against those who perpetrate fraud, theft or bribery.

SLH wish to carry out our business transparently and fairly; therefore through the implementation of this policy, we operate a zero tolerance approach towards bribery. We are committed to avoiding working with other organisations or individuals who do not commit to doing business without bribery.

Incidences of fraud, theft or bribery could lead to SLH's reputation being damaged and to deterioration in our relationships with our tenants, customers, business partners and colleagues and other stakeholders. Any individual's conduct can lead to prosecutions being brought against SLH and can impact directly on our public reputation.

This Policy applies to:

- board and committee members,
- colleagues
- Tenants
- Agency staff, contractors, agents and other associated persons representing SLH and its subsidiaries

Those providing services under a contract or other agreement with SLH This policy refers to all of the abovementioned people as 'individuals'. Any individual who becomes aware of any potentially dishonest or fraudulent activity is required to report it to the 'appropriate senior person' within SLH immediately.

## 3 Policy aims

The aims of this policy are to:

- Deliver the aims of the Probity Framework
- Ensure all Board, Committee members, colleagues, involved residents and those representing SLH are aware of this policy and act in line with it and are aware of their responsibilities in identifying and reporting fraud
- Support the development and maintain effective controls to prevent fraud, theft and bribery
- Outline the process to be followed in the reporting of fraud, theft, corruption or malpractice
- Ensure appropriate investigation is conducted where fraud, theft, bribery or corruption occurs or is suspected
- Ensure appropriate action against the perpetrators
- Ensure all cases of actual or attempted fraud, theft, bribery or other corruption are recorded

- Ensure a record of all fraudulent payments made by SLH to third parties is kept

## **4 Legislation**

### **4.1 Fraud**

The Fraud Act 2006 defines fraud in three ways:

- False representation
- Failing to disclose information
- Abuse of position

It may be defined as “any act of intentional deception to obtain benefit or gain an advantage”. SLH accept this definition of fraud in the management of our activities.

SLH view fraud as unacceptable behaviour, it is listed in the Terms and Conditions of Employment as an example of gross misconduct. Acts of gross misconduct of this nature are likely to result in dismissal.

Prosecution under the Fraud Act 2006 could lead to a prison sentence of up to 10 years.

There are a number of different types of fraud that are faced by the housing sector. A list of known fraud risk types can be found at appendix B.

The Criminal Finances Act 2017 makes companies and partnerships criminally liable if a colleague or an external agent facilitates tax evasion by a taxpayer, and the organisation failed to prevent that facilitation by way of reasonable prevention procedures. Prosecution could potentially lead to both a conviction and unlimited penalties

### **4.2 Bribery**

The Bribery Act came into force on 1 July 2011 and it applies to SLH and all our subsidiaries. The Act contains four principal bribery offences:

- Bribing someone to encourage or reward ‘improper performance’ of a function or activity – this includes offering, promising or actually giving a bribe
- Being bribed resulting in an activity or function being ‘improperly performed’ or resulting from an activity or function being ‘improperly performed’. This includes requesting, agreeing to receive or receiving a bribe
- Bribing a foreign public official
- The corporate offence.

A bribe is ‘a gift or reward given, offered or received to gain any business, commercial or personal advantage’. Examples of bribery can be found at appendix A.

The Bribery Act introduces a strict liability offence for organisations where someone associated with an organisation, including individuals, agents or sub-contractors, commits an act of bribery to obtain or retain business or a business advantage.

Strict liability means that SLH may be liable in law without the finding of fault. At court, it need only be proved that a bribe was made by someone associated with SLH with the intention of giving us a business advantage, whether or not SLH encouraged such action or was aware of it. The responsibilities under the Act therefore need to be taken extremely seriously.

Prosecution under the Bribery Act could result in SLH receiving an unlimited fine and potentially becoming debarred from tendering for public contracts.

Breaches of the Bribery Act could also lead to penalties for senior officers with whose “consent or connivance” bribery was committed. Individuals can be found guilty of bribery and, in the most serious cases, be liable on conviction to imprisonment for up to 10 years, to a fine, or to both.

## **4.3 Money Laundering**

The legislative requirements regarding money laundering are set out in the Money Laundering Regulations 2017.

Money laundering is the process by which funds derived from criminal activity (which may include drug trafficking, terrorism or human trafficking) are given the appearance of being legitimate by being exchanged for clean money with the intention to disguise the original source of funds.

There is a potential detrimental effect for SLH in that properties can be used for criminal activities, such as drug dealing, prostitution and cultivating cannabis, or illegally sublet thus reducing the housing stock available to our customers.

SLH will:

- Ensure an anti-money laundering risk assessment is carried out
- Have in place checks, controls and procedures to prevent money laundering
- Train colleagues in those procedures and the law relating to money laundering
- Appoint a nominated officer to receive and consider internal disclosures and make suspicious activity reports to the National Crime Agency
- Retain records in line with record keeping retention schedules

SLH colleagues should be vigilant and challenge unusual behaviours to help reduce the opportunity for criminal activity taking place through money laundering. This includes:

- Ensuring all customers provide sufficient proof of their identity at first contact
- Understanding the source of funds for transactions
- Investigating unusual transactions

- Reporting concerns to the nominated officer – SLH's Finance Manager – Capital and Treasury

#### **4.4 Theft**

Theft is defined as the dishonest taking without consent with the intention of not returning property belonging to SLH or which has been entrusted to it, including:

- Cash
- Equipment
- Vehicles
- Data.

Theft does not necessarily require fraud to be committed, and can include the taking of property belonging to another member of staff, customers, or Board members.

#### **4.5 Corruption**

Corruption is defined as a person in a position of authority or trust who abuses their position for benefit or gain for themselves or for another person.

### **5 Internal Controls**

If the potential for fraud or bribery is highlighted by an individual, the Manager/Internal Auditor will take appropriate action to improve the systems. If there are indications that an external organisation may be trying to defraud the organisation the Chief Executive and/or Internal Auditor will be informed immediately.

The Executive Leadership Team or their authorised representative, has the authority to access all records relating to any SLH transaction, request explanations as are necessary concerning any matter under investigation, and require any colleague to produce association cash or property under their control. Access to SLH's information systems is controlled through an Information Security Policy. Privileged access to information would only be granted with written authorisation from the Chief Executive and / or Director with responsibility for ICT or Finance.

#### **5.1 Audit and Risk Committee**

The overall purpose of the committee is to ensure that the company's internal control system operates satisfactorily, that SLH has adequate Risk Management arrangements in place and to monitor the Internal Audit programme on behalf of the board.

The Audit and Risk Committee will serve all companies within SLH. The committee will ensure that any significant matters of concern relating to the subsidiaries are brought to the attention of both the SLH board and to the relevant subsidiary board.

Any incidents of actual or attempted fraud or irregularities will be recorded in the Fraud Register. The Audit & Risk Committee is responsible for monitoring all reports of fraud, bribery, theft and actual or suspected money laundering through the quarterly fraud report.

## **5.2 Risk assessment**

SLH will undertake comprehensive risk assessments for fraud, theft bribery and money laundering in relation to SLH and its subsidiaries.

Checks, controls and procedures will be in place to prevent fraud, theft, money laundering and bribery. Further details on the controls to prevent Tenancy Fraud can be found in the Tenancy Management Policy.

## **5.3 Bribery Adequate procedures – the six management principles**

There is a defence to the corporate offence if SLH can show we had adequate procedures in place, designed to prevent bribery. The Ministry of Justice has issued guidance which sets out six broad management principles to assist organisations to put in place proper anti-bribery procedures.

Through this policy, SLH follows these principles to show that we are committed to preventing the occurrence of bribery within SLH:

- Proportionality: this Bribery Policy which is supported by a procedure, is proportionate to the activities and size of SLH, the sector in which we operate and the risks we face
- Top level commitment: we have a clear culture through our codes of governance and conduct and management culture within which bribery is considered a wholly unacceptable practice
- Risk assessment: we understand and keep up to date with the bribery risks we face by carrying out regular and comprehensive risk assessments
- Due diligence: through our Procurement Process we ask our partners to have reciprocal anti-bribery agreements in place. We conduct an annual review of our partners as it is important that we know about whom we do business with, and whom we pay money to and why
- Communication: this Bribery Policy is communicated to all individuals and business partners so that they know the procedures to follow in situations which may be sensitive to bribery
- Monitor and review procedures designed to prevent bribery and make improvements where necessary

## **5.4 Expenses**

Through this policy both individuals and SLH ensure that any expenses claims are in accordance with:



- For Board and Committee members, SLH's Board and Committee Members Payments and Expenses Policy
- For colleagues, the Colleague Expenses Policy
- For involved residents, the Volunteer Policy

All expenses must be properly recorded and supported by receipts (other than in exceptional circumstances).

## **5.5 Gifts and Hospitality**

This policy must be read in conjunction with SLH's Gifts and Hospitality Policy in particular in relation to:

- Approval of levels of hospitality and gifts
- The need to declare hospitality and gifts
- The need to seek permission to offer hospitality and gifts
- The need to keep a register of declarations

Neither this policy nor the Gifts and Hospitality Policy prohibits the giving or receiving of reasonable, proportionate and appropriate hospitality or gifts to or from people and organisations SLH works in partnership with. What both policies do is provide an open and transparent framework for acceptance and management of offers.

If you suspect that hospitality or gifts are being offered or provided with an expectation that a business advantage will be provided by SLH in return, then you must not accept it and you must report this to the Company Secretary immediately.

Any hospitality or gifts offered to you (including both accepted and declined) and offered by you (subject to you having the necessary approval to make such an offer) should be declared appropriately. Unofficial payments or kick-backs should not be offered or accepted under any circumstances.

## **5.6 Dealings with third parties**

SLH undertake to record and receipt all payments to third parties. In making any such payments, we consider what these payments are for and whether they are reasonable and proportionate.

## **5.7 Charitable donations**

SLH only make charitable donations that are legal and ethical. No donation will be offered or made without the prior approval of the Company Secretary. In making charitable donations an assessment is made of whether it would be appropriate to make such a donation under a formal grant agreement. A Sponsorship Policy details SLH's approach in more detail.

## **5.8 Political donations**

SLH do not make political donations.

## 5.9 Training

Individuals receive training on anti-corruption measures and the requirements of this policy as part of the induction process and then throughout their work with SLH.

As an individual, you must attend any training you are required to attend and, where you cannot attend a session that has been organised, you must arrange to attend an alternative session.

## 5.10 Advice

You should seek advice from the Company Secretary if you are unsure about how the provisions of this policy should be applied. Where appropriate, the Company Secretary will seek legal advice on anti-bribery, fraud or corruption issues.

## 6 Reporting Fraud, Theft, Bribery or Corruption

All individuals have a duty to report any suspected breach of the SLH Code of Conduct, or other policies. They also have a duty to report any known or suspected matters of fraud or irregularities in the functions of SLH. Any suspicion of fraud, theft or other irregularity should be reported immediately to:

- Finance Manager – Capital and Treasury
- The Executive Director of Finance

Or in the case that it cannot be reported to the above then suspicions should be reported to the following:

- The Chief Executive
- The Chair of the Board
- The Chair of Audit and Risk Committee

If the person suspected is the Chief Executive, then the matter should be reported to the Chair of Audit and Risk Committee or Chair of the Board.

Board and committee members, colleagues and involved residents should not be afraid to report cases of alleged fraud, theft or bribery. Any such allegation will be treated seriously and in the strictest confidence. The Public Interest Disclosure Act 1998 provides appropriate protection for those who voice genuine and legitimate concerns through the proper channels.

The Chief Executive and/or Internal Auditor must be informed within one working day of the initial reporting of the allegation and prior to an investigation being undertaken.

Where attempted or actual fraud, bribery or theft has occurred this must be recorded on the fraud register (appendix A).

Where there is evidence that fraud, bribery or theft has occurred, the relevant colleague(s) may be suspended in order for a full investigation to take place, the

ultimate decision to suspend will lie with the Chief Executive. Suspension should not be regarded as disciplinary action or imply guilt.

Where a complaint is received from a source other than a board and committee member, colleague or involved residents, they will be asked to meet a member of the Executive Leadership Team so that the facts of the report can be established.

Anonymous reports of alleged fraud must be dealt with as appropriate. All allegations must be reported to the Chief Executive and to the Internal Auditor immediately.

Should you suspect fraud, theft or bribery and are uncomfortable in reporting to the Company Secretary, SLH's Speak Up Policy must be followed.

## **7 Investigation**

Where there is a suspicion of bribery, theft or fraud we may appoint an independent auditor to review the situation prior to the commencement of a formal investigation. The procedures supporting implementation provide more detail on who and how SLH will deal with the reported breach.

An investigating officer will be appointed by the Executive Leadership Team or where the allegation is about a member of the Leadership team or a board or committee member, the SLH Board Chair will appoint the Investigating Officer.

The investigation process outlined in SLH's Disciplinary Policy will be followed. In the case of suspected fraud, the investigation may involve:

- Observation of suspected perpetrator
- Analysing evidence
- Interviewing suspect, colleagues, tenants, residents and external sources
- Cautioning of suspect – where there is a possibility of subsequent criminal action

Where there is evidence that a criminal act has taken place, the police should be informed. The Investigating Officer will inform the Chair of Audit and Risk Committee and the Chair of the Board of the action taken.

A detailed record of the investigation must be maintained and a report must be produced, either in the form of an audit report detailing the findings and recommendations, or a statement detailing the evidence obtained for use in legal proceedings.

All actual or attempted fraud will be recorded in the Fraud Register and reported to the Regulator of Social Housing (RSH) in accordance with the Governance and Financial Variability Standard. The Fraud Register will be maintained by the Company Secretary.

For instances involving colleagues, SLH's Disciplinary Policy will be invoked. For instances of fraud involving board or committee members and involved residents,

a breach of the relevant code of conduct may result in their removal from their position.

A breach by an involved resident will be treated as a breach of trust. An investigation into any allegation of such a breach made against an involved resident will be conducted in accordance with the Code of Conduct.

Where SLH discovers bribery has taken place, it will make a full disclosure of this to the Serious Fraud Office and co-operate fully in any investigation carried out by the Serious Fraud Office.

## 8 Standards & Performance Monitoring

- The Fraud Register is reviewed quarterly by the Audit and Risk Committee
- Record and report all discovered cases of fraud or attempted fraud
- Complete an annual return to the RSH
- Through audit and other internal controls, SLH will monitor our anti-bribery procedures to prevent and detect bribery to provide assurance that its procedures are working. Allegations and investigations of bribery will be reported in the first instance to the Audit and Risk Committee.
- Attached at [C](#) is an Anti-Bribery 'Adequate Procedures' Checklist. This policy is designed to address these principles and, primarily, the second key principle of demonstrating top level commitment and the fifth key principle of having clear, practical and accessible policies and procedures properly communicated to people and organisations. This policy complements the other procedures SLH has in place to avoid bribery and corruption.
- The Board has delegated to the Company Secretary the specific responsibility for maintaining general awareness of and compliance with this Bribery Policy.
- The Audit and Risk Committee, Chief Executive, Executive Management Team members and the Company Secretary will monitor the operation and adequacy of this policy on a regular basis and will report to the SLH Board on any problems.
- The Audit and Risk Committee will report to the Board no less frequently than every 12 months on SLH's anti-bribery compliance.
- The Chair of Audit and Risk is responsible for compliance with the Money Laundering regulations

## 9 Policy Review Considerations

The Risk Map has been updated to take into consideration the risks associated with the act of fraud, money laundering and bribery to the organisation. Risk POU06

This policy was updated with guidance from the NROSH+ Fraud Guidance for Registered Providers.

## 9.1 Equality Analysis

An Equality Analysis has been completed for this policy.

## 10 Statutory and Legislative Framework

- Fraud Act 2006
- Public Interest Disclosure Act 1998
- NROSH+ Governance and Financial Variability Standards
- Charities Act 2006, 2011
- Companies Act 2006
- Housing Act 1996, 2004
- Housing and Regeneration Act 2003
- Data Protection Act 2018
- NHF Code of Conduct 2022
- Bribery Act 2010
- Equality Act 2010
- Prevention of Social Housing Fraud Act 2013
- Theft Acts 1968 / 1978
- Bribery Act 2010
- NROSH+ Fraud Guidance for Registered Providers
- Misuse of Computer Act 1990
- Housing Associations Act 1985
- Money Laundering Regulations 2003, 2017
- Proceeds of Crime Act 2010
- NHF Code of Governance 2015
- Cooperative and Community Benefit Societies Act 2014
- Criminal Finances Act 2017

## 11 Associated Policies

- Codes of Governance and Conduct
- Standing Orders
- Financial Regulations
- Probity Framework
- Speak Up Policy
- Board and Committee Member Payment, Expenses & Benefits Policy
- Sponsorship Policy
- Disciplinary Policy
- Customer Feedback Policy
- Information Security Policy
- Terms & Conditions of Employment
- Declarations of Interest Policy
- Allocations & Tenure Policy
- Tenancy Management Policy
- SLH rules of association

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## Appendix A – Fraud Register

| Column              | A   | B   | C  | D              | E                       | F                   | G                           | H               | I                 | J                    | K              | L   |
|---------------------|---|---|--|----------------|-------------------------|---------------------|-----------------------------|-----------------|-------------------|----------------------|----------------|---|
| Fraud record number | Business stream   | Gross amount of loss (estimate if necessary, before any recovery col K) | Type   | Nature of loss | Means of identification | Date board notified | Previously reported to RSH? | Police advised? | Auditors advised? | Disciplinary action? | Recovery A/E/I | Description of fraud and action taken e.g. investigation            |
|                     |   | Key below   | No 1:  | No 2:          | No 3:                   |                     |                             |                 |                   |                      |                |   |
| 1                   |   |   |  |                |                         |                     |                             |                 |                   |                      |                |   |
| 2                   |   |   |  |                |                         |                     |                             |                 |                   |                      |                |   |
| 3                   |   |   |  |                |                         |                     |                             |                 |                   |                      |                |   |
| 4                   |   |   |  |                |                         |                     |                             |                 |                   |                      |                |   |
| 5                   |   |   |  |                |                         |                     |                             |                 |                   |                      |                |   |
| 6                   |   |   |  |                |                         |                     |                             |                 |                   |                      |                |   |
| 7                   |   |   |  |                |                         |                     |                             |                 |                   |                      |                |   |
| 8                   |   |   |  |                |                         |                     |                             |                 |                   |                      |                |   |
| 9                   |   |   |  |                |                         |                     |                             |                 |                   |                      |                |   |
| 10                  |   |   |  |                |                         |                     |                             |                 |                   |                      |                |   |
| Key                 | <b>1: Type</b><br>a Theft - general<br>b Theft - rent<br>c Theft - goods<br>d Tenancy<br>e Voids<br>f Development<br>g Maintenance<br>h Procurement<br>i Payroll<br>j Other |   | <b>2: Nature of Loss</b><br>A Cash/ cheque<br>B Other Assets<br>C Reputation<br><br><b>3: Means of identification</b><br>1 Internal audit<br>2 External audit<br>3 Routine management<br>4 "Whistle blowing"<br>5 Other (please state) |                |                         |                     |                             |                 |                   |                      | Actual/        | Include details such as collusion, control system failure, computer |

## Appendix B - Fraud Risks

|  |   |
|--|---|
| <ul style="list-style-type: none"> <li>• Recruitment</li> <li>• Immigration</li> <li>• Procurement</li> <li>• Payment systems – through false claims i.e. overtime expenses</li> <li>• Contractors (bogus/inflated invoices, work not conducted to specification)</li> <li>• Property assets – sale/right to buy, tenancy/subletting fraud</li> <li>• Data/theft misuse</li> <li>• Accounting manipulation</li> <li>• Cyber attacks</li> <li>• Theft of assets</li> <li>• Theft of materials from sited</li> <li>• Theft of petty cash</li> <li>• Theft of sensitive data when staff leave</li> <li>• Uncleared cheques</li> <li>• Accounts manipulation – balancing books, misreporting, misrepresentation of debt</li> <li>• Awarding contracts for personal gain</li> <li>• Benefit fraud</li> <li>• Cheque manipulation</li> <li>• Staff working elsewhere while off sick</li> <li>• Theft of client money</li> <li>• Tenancy manipulation</li> <li>• Tenant – contractor collusion over specification of works</li> <li>• Tenant – staff collusion</li> <li>• Client cash transactions</li> </ul> | <ul style="list-style-type: none"> <li>• Collusion – valuers and contractors, supply chain</li> <li>• Conflicts of interest</li> <li>• Employment of illegal workers</li> <li>• False claims – void properties</li> <li>• False disrepair claims</li> <li>• False documents submitted by tenants to secure tenancies</li> <li>• False suppliers</li> <li>• Falsifying timesheets/overtime</li> <li>• False CVs from employees</li> <li>• ‘ghost’ employees on payroll</li> <li>• ‘ghost’ maintenance jobs</li> <li>• Gifts and hospitality</li> <li>• Illegal use of properties – organised crime, cannabis farms</li> <li>• Introduction fees on land purchases</li> <li>• Inflated/bogus invoicing</li> <li>• Mileage/expenses claims</li> <li>• Misreporting of performance indicators – internal and contractors</li> <li>• Money laundering</li> <li>• Over ordering goods</li> <li>• Overpaying for land</li> <li>• Overvaluing work</li> <li>• Personal use of contractors at reduced rates</li> <li>• Property allocation – fast tracking friends/relatives</li> <li>• Selling keys (tenants and staff)</li> <li>• Selling/theft/destruction of sensitive data</li> <li>• Services not received by paid for</li> <li>• Services not to specification or in line with contract.</li> </ul> |
|--|---|

## Breaches and bribery examples

An individual must report a breach of this policy to the Company Secretary within one working day. A breach can include:

- If a contractor offers you something in return for business

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- If you are ever offered a bribe, suspect that this may happen in the future or if you think you are a victim of another form of unlawful activity
- If you have any concerns or suspicions that any of your colleagues may be involved in bribery or corruption
- You learn that one of the contractors you regularly deal with has a reputation for paying bribes or requiring that bribes are paid to them
- A supplier asking you to provide an invoice or receipt when no money is payable or has been paid
- A supplier insisting on being paid in cash and/or refuses to sign a formal agreement
- A contractor offering to pay you cash to provide employment for a friend or relative
- You notice that we have been invoiced for a payment which seems large given the service / goods which have been provided
- You are offered an unusually generous gift or lavish hospitality
- You are offered substantially discounted fees for supply of goods to you as a private person
- You are offered a payment in cash if a contract is awarded to the contractor/supplier
- You are offered an incentive from a customer for supporting them with their housing application, arranging repairs for them or clearing their rent account arrears

Should you suspect bribery and are uncomfortable in reporting to the Company Secretary, SLH's Speak Up Policy must be followed.

SLH is keen to encourage openness and will support you if you raise any genuine concerns you have under this policy (even if they later turn out to be mistaken). We want to ensure no one suffers detrimental treatment (including disciplinary action or dismissal, threats etc.) because of such reporting or because of refusing to take a bribe – if you feel you have suffered such treatment contact the Company Secretary.



## Appendix C

### SLH's Anti-Bribery 'Adequate Procedure Checklist

#### 1. Top level commitment

SLH has made a clear commitment to tackling bribery within this anti-bribery policy. An anti-bribery statement has been included on our website and is included within all tender documentation for services to be carried out for SLH. SLH has appointed the Company Secretary who will support compliance with this policy.

#### 2. Risk assessment

SLH will carry out periodic, informed and documented risk assessments of potential bribery risks faced by

- The organisation in general
- Specific projects we are proposing to carry out
- Potential and existing relationships with contractors and agents

#### 3. Board and committee members, and involved residents

SLH will ensure our code of conduct includes reference to non-tolerance of bribery. We will provide training for board and committee members and involved residents on the Bribery Act and anti-bribery procedures.

#### 4. Colleagues

SLH will ensure our code of conduct includes reference to non-tolerance of bribery by SLH and that committing bribery will be considered gross misconduct.

SLH will review its terms and conditions of employment and disciplinary policy and procedures to determine if it is necessary to amend to include termination where bribery is committed.

SLH will provide regular training for colleagues, and consider specific training for those employees involved in procurement exercises and marketing.

We will incorporate anti-bribery measures into our recruitment policies and procedures, where this is appropriate to the role being recruited for (e.g. senior management and those involved in tendering and marketing etc.).

#### 5. Contractors and consultants

We will:

- Review our standard commercial contracts to ensure there is provision for termination where a contractor providing services, agent or consultant commits bribery
- Consider whether it is appropriate for provisions to be included to give SLH the ability to audit the organisation's activities and expenditure and require any requests for bribes to be reported to us

- Carry out appropriate due diligence on agents, consultants and contractors, including taking and checking references, checking ownership, checking details of other directorships or partnerships, reviewing financial statements and accounts, incorporating checks into interviews, reviewing any judicial or regulatory findings and keeping a record of all checks carried out. In carrying out such due diligence, we will have regard to the potential bribery risks posed by its relationship with such agents or contractors, especially where they operate in higher risk sectors (e.g. construction) where the project is of higher value and/or longer duration
- Require contractors to put in place appropriate anti-bribery procedures both internally and with sub-contractors (if applicable), including, if appropriate, bribery prevention training for employees
- Ensure hospitality is only offered where appropriate, reasonable and proportionate where any consultant, agent or contractor may offer hospitality on SLH's behalf. This may include providing such third parties with criteria for the provision of hospitality
- In employing consultants, contractors or agents, we will provide a clear statement of the services to be provided and any relevant costs, commissions and fees (except where this is clear from the contract with that third party).

## **6. Tendering**

We will

- Provide appropriate training to colleagues involved in tendering exercises to enable them to identify potential bribery risks
- Require all contractors for the provision of services to demonstrate a commitment to tackling bribery
- Include a statement about its stance towards bribery in all tender documents
- Review our standard tender documents to include a requirement for disclosure of bribery or other corruption offences

## **7. Communication**

We will:

- Be proactive in communicating our anti-bribery stance to individuals residents and external organisations
- Publish our anti-bribery statement on our website
- Carry out board and committee member and colleague training on potential bribery risks and anti-bribery compliance
- Review any feedback from board and committee members and staff in relation to anti-bribery training to make such training more effective.

## **8. Financial procedures**

SLH will review our internal expenses policies and procedures as they apply to all individuals to ensure that the process for reclaiming expenses is transparent. We will raise anti-bribery procedures with our internal auditors.

## **9. Joint ventures**

SLH will review all joint venture arrangements to assess if appropriate anti-bribery procedures should be put in place. We will review any existing joint venture and other partnership agreements to ensure both parties demonstrate a commitment to tackling bribery and allow termination if bribery takes place.

## **10. Mergers and acquisitions**

In considering any potential merger or acquisition, SLH will carry out appropriate due diligence on the other organisation(s) involved to assess and mitigate risk.