

# Anti-Bribery Policy

<b>1.0</b>	<b>SCOPE</b>
	<b>Purpose</b>
1.1	<p>whg will not tolerate any form of bribery or corruption. This policy sets out how colleagues and anyone else working for or on behalf of whg must:</p> <ul style="list-style-type: none"> <li>• recognise and prevent bribery and corruption in the workplace;</li> <li>• report any incidents of bribery or corruption, including actual, suspected or potential incidents, to the Fraud Prevention Officer (the Corporate Director of Governance, Compliance and Communications).</li> </ul>
	<b>Legal and regulatory framework</b>
1.2	The Regulator of Social Housing's (RSH) Governance and Financial Viability Standard requires Registered Providers to adhere to all relevant law and comply with their governing documents and all regulatory requirements. It also stipulates that the interests of the taxpayer and the reputation of the sector must be protected.
1.3	The Bribery Act 2010 generally defines bribery as giving someone a financial or other advantage to encourage that person to perform their functions or activities improperly or to reward that person for having already done so. Examples of possible bribery are set out in Appendix 1.
	<b>Risk</b>
1.5	<p>whg's main risks of bribery arise:</p> <ul style="list-style-type: none"> <li>• From contractors, e.g. a bribe offered to award a contract;</li> <li>• From customers, e.g. a bribe offered to allocate a property;</li> <li>• From colleagues, e.g. soliciting a bribe to carry out repair work.</li> </ul>
1.6	Service managers assess risks of bribery and put in place appropriate mitigations as part of their quarterly review of operational risks. All managers should be alert to any potential risk or sign of bribery.
1.7	whg applies due diligence procedures, taking a proportionate and risk-based approach, for people and organisations who perform or will perform services for or on behalf of whg, or who work in partnership with whg, in order to mitigate identified bribery risks.
<b>2.0</b>	<b>POLICY STATEMENT</b>
2.1	Colleagues <b>must</b> :

	<ul style="list-style-type: none"> <li>• Refuse any bribe clearly; and</li> <li>• Report any bribe or attempted bribe immediately to the Fraud Prevention Officer (or if unavailable or is suspected of being involved, to the Group Chief Executive).</li> </ul>
2.2	<p>Bribery is offering, promising, giving or accepting any financial or other advantage:</p> <ul style="list-style-type: none"> <li>• to induce the recipient or any other person to act improperly in the performance of their functions; or</li> <li>• to reward them for performing their functions or activities improperly; or</li> <li>• where the recipient would act improperly by accepting the advantage.</li> </ul>
2.3	<p>An advantage includes money, gifts, loans, fees, hospitality, services, discounts, the award of a contract or anything else of value.</p>
2.4	<p>A person acts improperly where they act illegally, unethically, or contrary to an expectation of good faith or impartiality, or where they abuse a position of trust. The improper acts may be in relation to any business or professional activities, public functions, acts in the course of employment, or other activities by or on behalf of any organisation of any kind.</p>
2.5	<p>Corruption is the abuse of entrusted power or position for private gain.</p>
2.6	<p>In this policy, references to 'colleagues' includes all whg employees, Board members and Committee members. References to 'business partners' includes all suppliers, contractors and contractual partners.</p>
2.7	<p>whg colleagues must never accept or offer any gifts and/or hospitality which might, or reasonably appear to, compromise their personal judgment or integrity or place them under an improper obligation. Information around accepting or offering gifts and hospitality can be found in the Gifts and Hospitality Policy.</p>
2.8	<p>This policy does not prohibit the following practices providing they are proportionate, comply with whg's Code of Conduct if necessary and are properly recorded:</p> <ul style="list-style-type: none"> <li>• whg's contractors or suppliers adding contractual social value to the services they provide to whg (as set out in the Social Value in Procurement Policy);</li> <li>• The use of an official/recognised fast-track process which is available to all on payment of a fee.</li> </ul> <p>If there is any doubt, colleagues must refer the matter to the Governance Team.</p>
2.9	<p>As a charity, whg does not make contributions or donations to political parties, elected individuals or candidates for election. Colleagues may make personal contributions, provided they are not made in any way to obtain advantage in a business transaction and are completely separate to their role at whg and do not reference whg in any way.</p>
2.10	<p>whg is committed to charitable giving and supporting the community. Donations must not be made with the intention of gaining improper influence. Where a supplier wishes to support whg's chosen charity, any payment must be made directly to the charity.</p>

2.11	Incidents of bribery or corruption may be reported to the police or the appropriate regulatory body. Any colleague who breaches this policy may be subject to disciplinary action, which could result in dismissal for gross misconduct. Any Board or Committee member who breaches the policy may be removed.
	<b>Reporting and investigating</b>
2.12	<p><u>Colleagues must report to the Fraud Prevention Officer:</u></p> <ul style="list-style-type: none"> <li>• concerns that other colleagues, customers or contractors may be being bribed or being offered bribes;</li> <li>• concerns that other colleagues, customers or contractors may be offering or giving bribes.</li> </ul>
2.13	<p><u>The Fraud Prevention Officer must:</u></p> <ul style="list-style-type: none"> <li>• arrange for any reported incidents to be investigated in line with the Fraud Response Plan;</li> <li>• report the incident to the relevant authorities, the Audit and Assurance Committee and/or the whg Board where appropriate.</li> </ul>
<b>3.0</b>	<b>PERFORMANCE MEASURES</b>
3.1	Service Managers are required to review and update their risks and mitigations quarterly as part of their operational risk monitoring. Updates are monitored by the Risk and Compliance Officer.
<b>4.0</b>	<b>EQUALITY AND DIVERSITY</b>
4.1	whg acknowledges the potential for cultural differences to be considered a bribe which others may consider to be a social obligation. It is whg's responsibility to support colleagues in addressing these cultural differences consistently and sensitively.
<b>5.0</b>	<b>TRAINING AND DISSEMINATION</b>
5.1	Bribery and corruption training forms part of whg's Fraud Awareness training approach, including annual training for all colleagues, bespoke to their role, and regular awareness updates to colleagues via whg's intranet, whoogle.
<b>6.0</b>	<b>MONITOR AND REVIEW</b>
6.1	This policy is monitored by the Corporate Director of Governance, Compliance and Communications and is reviewed every three years by the Policy Group and approved by the Audit and Assurance Committee.
<b>7.0</b>	<b>ASSOCIATED DOCUMENTS, POLICIES AND PROCEDURES</b>
7.1	<ul style="list-style-type: none"> <li>• Codes of Conduct for colleagues and Board and Committee members</li> </ul>

	<ul style="list-style-type: none"> <li>• Gifts and Hospitality Policy</li> <li>• Probity Policy</li> <li>• Fraud Prevention Policy and Fraud Response Plan</li> <li>• Whistleblowing Policy</li> <li>• Financial Delegations</li> <li>• Procurement Policy and Procedures</li> </ul>
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<b>Document author</b>	Governance and Policy Officer
<b>Document owner</b>	Corporate Director of Governance, Compliance and Communications
<b>Legal advice</b>	N/A
<b>Consultation</b>	Colleague only
<b>Approved by</b>	Audit and Assurance Committee – April 2024
<b>Review Date</b>	April 2027
<b>Corporate Plan aim</b>	Deliver a strong business, fit for today and prepared for tomorrow
<b>Equality analysis</b>	N/A
<b>Key changes made</b>	Additional definitions and signposting to other policies

## Appendix 1

### Examples of Bribery

- A partner organisation offers cash to whg to employ their daughter.
- A colleague agrees to do repairs for cash from a whg customer.
- A supplier offers substantially discounted goods to an individual in exchange for remaining as a preferred supplier.
- A manager is offered a weekend trip for their family in exchange for winning a contract.
- A colleague is offered cash for granting a tenancy.
- A partner organisation offers an inducement for issuing an invoice for works they have not done.
- A colleague offers a Board Member cash to support their plans.
- A Board Member persuades a colleague to make an offer of housing to their relative who is not in housing need.
- A manager offers a colleague cash for not telling anyone that they received a new kitchen from a contractor.
- A customer offers a colleague cash in return for not following up on their breach of tenancy.
- whg offers a bribe to Council officials to obtain planning permissions.
- whg offers a bribe to a developer to obtain Section 106 properties.