



GOV-POL-05-03
Anti-Bribery Policy

Table of Contents

Page No.

1.	Introduction.....	4
2.	Who is Covered?	4
3.	What is Bribery?.....	4
4.	Gifts & Hospitality....	5
5.	What is not Acceptable?.....	5
6.	Donations.....	6
7.	Your Responsibilities.....	6
8.	Record Keeping.....	6
9.	How to Raise a Concern.....	6
10.	What to do if you are a Victim.....	7
11.	Protection.....	7
12.	Training.....	7
13.	Who is Responsible for the Policy?.....	7
14.	Monitoring.....	8
15.	Review.....	8

1. Introduction

- 1.1 As Registered Providers and Registered Charities, Torus Group Members (consisting of Helena Partnerships and its subsidiaries and Golden Gates Housing Trust hereinafter called “the Group”) has a policy to conduct all of its 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 and implementing and enforcing effective systems to counter bribery.
- 1.2 We will uphold all laws relevant to countering bribery and corruption in all the jurisdictions in which we operate. However, we remain bound by the laws of the UK, including the Bribery Act 2010, in respect of our conduct both at home and abroad.
- 1.3 The purpose of this policy is to:
 - set out our responsibilities, and of those working for us, in observing and upholding our position on bribery and corruption; and
 - provide information and guidance to those working for us on how to recognise and deal with bribery and corruption issues.
- 1.4 Bribery and corruption are punishable for individuals by up to ten years' imprisonment and if a member of the Group is found to have taken part in corruption it could face an unlimited fine, be excluded from tendering for public contracts and face damage to its reputation. We therefore take our legal responsibilities very seriously.
- 1.5 In this policy, **third party** means any individual or organisation you come into contact with during the course of your work for the Group and includes actual and potential clients, customers, suppliers, distributors, business contacts, agents, advisers, and government and public bodies, including their advisors, representatives and officials, politicians and political parties.

2. Who is Covered by the Policy?

- 2.1 This policy applies to all individuals working at all levels and grades, including board directors, officers, employees (whether permanent, fixed-term or temporary), consultants, contractors, trainees, seconded staff, homeworkers, casual workers and agency staff, volunteers, interns, agents, sponsors, or any other person associated with us or their employees, wherever located (collectively referred to as **workers** in this policy).

3. What is Bribery?

- 3.1 A bribe is an inducement or reward offered, promised or provided in order to gain any commercial, contractual, regulatory or personal advantage. An example of offering a bribe might be the offer a potential client tickets to a major sporting event, but only if they agree to do business with us. An example of receiving a bribe might be a supplier that gives a

relative of an employee a job, but makes it clear that in return they expect you to use your influence in the Group to ensure we continue to do business with them.

- 3.2 The Bribery Act 2010 makes it an offence to bribe a foreign official which might consist of an additional payment to a foreign official to speed up an administrative process. As the Company does not carry out any business overseas this is unlikely to pose a risk however it is something of which you should be aware.
- 3.3 Facilitation payments are small, unofficial payments made to secure or expedite a routine government action by a government official. They are not commonly paid in this country but are common in some other jurisdictions. Again, the risk of this affecting the Group is highly unlikely but should not be discounted entirely.
- 3.4 If you are asked to make a payment on the Group's behalf, you should always be mindful of what the payment is for and whether the amount requested is proportionate to the goods or services provided. The procedures detailed in the Financial Regulations and the Contracts Standing Orders should always be followed and if you have any suspicions, concerns or queries regarding a payment, you should raise these with the Company Secretary.

4 Gifts & Hospitality

- 4.1 The Bribery Act 2010 does not prohibit normal and appropriate hospitality (given and received) to or from third parties, however you must make sure that any gifts or hospitality are dealt with in accordance with the Probity Policy and the Code of Conduct.

5. What is not acceptable?

- 5.1 It is not acceptable for you (or someone on your behalf) to:
 - give, promise to give, or offer, a payment, gift or hospitality with the expectation or hope that a business advantage will be received, or to reward a business advantage already given;
 - give, promise to give, or offer, a payment, gift or hospitality to a government official, agent or representative to "facilitate" or expedite a routine procedure;
 - accept payment from a third party that you know or suspect is offered with the expectation that it will obtain a business advantage for them;
 - accept a gift or hospitality from a third party if you know or suspect that it is offered or provided with an expectation that a business advantage will be provided by us in return;
 - threaten or retaliate against another worker who has refused to commit a bribery offence or who has raised concerns under this policy; or
 - engage in any activity that might lead to a breach of this policy.

6. **Donations**

6.1 We only make charitable donations that are legal and ethical under local laws and practices. No donation must be offered or made without the prior approval of the Company Secretary.

7. **Your Responsibilities**

7.1 You must ensure that you read, understand and comply with this policy.

7.2 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 workers are required to avoid any activity that might lead to, or suggest, a breach of this policy.

7.3 You must notify your manager or the Company Secretary 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 client or potential client 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.

7.4 Any employee who breaches this policy will face disciplinary action, which could result in dismissal for gross misconduct. We reserve our right to terminate our contractual relationship with other workers if they breach this policy.

7.5 A breach of this policy will be dealt with following the process set out in Appendix 1 of this document.

8. **Record Keeping**

8.1 We must keep financial records and have appropriate internal controls in place which will evidence the business reason for making payments to third parties.

8.2 Reports of all hospitality or gifts accepted or offered, are to be made in accordance with the Probity Policy and Code of Conduct which will be subject to managerial and Board review.

8.3 All accounts, invoices, memoranda and other documents and records relating to dealings with third parties, such as clients, suppliers and business contacts, should be prepared and maintained with strict accuracy and completeness in accordance with the Group's Financial Regulations. No accounts must be kept "off-book" to facilitate or conceal improper payments.

9. **How to Raise a Concern**

9.1 You are encouraged to raise concerns about any issue or suspicion of malpractice at the earliest possible stage. If you are unsure whether a particular act constitutes bribery or corruption, or if you have any other queries, these should be raised with your line manager. Concerns should be reported by following the procedure set out in our Whistleblowing Policy. A copy of our Whistleblowing Policy can be found in the Document Repository or on the SHE system.

9.2 If the person suspected of any malpractice is the employee's line manager then concerns should be raised with the Director of Organisational Development.

10. What to do if you are a Victim of Bribery or Corruption

10.1 It is important that you tell your line manager or the Company Secretary as soon as possible if you are offered a bribe by a third party, are asked to make one, suspect that this may happen in the future, or believe that you are a victim of another form of unlawful activity.

11. Protection

11.1 Workers who refuse to accept or offer a bribe, or those who raise concerns or report another's wrongdoing, are sometimes worried about possible repercussions. 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.

11.2 We are committed to ensuring no one suffers any detrimental treatment as a result of refusing to take part in bribery or corruption, or because of reporting in good faith their suspicion that an actual or potential bribery or other corruption offence has taken place, or may take place in the future. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If you believe that you have suffered any such treatment, you should inform the Company Secretary immediately. If the matter is not remedied, and you are an employee, you should raise it formally using our Grievance Procedure.

12. Training and communication

12.1 Training on this policy will form part of the induction process for all new workers. All existing workers will receive a briefing on how to implement and adhere to this policy.

12.2 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.

13. Who is responsible for the policy?

13.1 The Board of Directors has overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it.

13.2 The Company Secretary has primary and day-to-day responsibility for implementing this policy and for monitoring its use and effectiveness and dealing with any queries on its interpretation. Management at all levels are responsible for ensuring those reporting to them are made aware of and understand this policy and are given adequate and regular training on it.

14. Monitoring and review

- 14.1 The Group Head of Legal Services will monitor the effectiveness and review the implementation of this policy, regularly considering its suitability, adequacy and effectiveness. Any improvements identified will be made as soon as possible. Internal control systems and procedures will be subject to regular audits to provide assurance that they are effective in countering bribery and corruption.
- 14.2 This policy does not form part of any employee's contract of employment and it may be amended at any time.

15. Review Information

- 15.1 The company will review this policy annually and provide for interim reviews in light of legislative or policy changes.
- 15.2 Review date March 2019.