



Anti-Bribery Policy

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Policy Owner Role Title	Assistant Director of Governance and Compliance
Responsible Director	Executive Director, Finance

Policy Checklist

Is Customer engagement required?	No
Does this policy require input or validation from external or legal experts?	No
Is an Equality Impact Assessment (EIA) required?	No
Is a Data Protection Impact Assessment (DPIA) Required?	No
Is the Policy compliant with relevant legislation and regulatory requirements?	Yes
Has the Policy Development Guide been followed?	Yes



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1.0 Introduction and scope

Definition of Bribery

Bribery is a crime defined within the Bribery Act 2010. The penalty for committing a crime under the act is a maximum of 10 years in prison.

A bribe is a financial or other advantage that is offered or requested with the intention of inducing or rewarding the improper performance of a relevant function or activity. An example of bribery is a payment to an official for help securing a contract – also known as a Kickback.

This Anti-Bribery Policy has been developed in line with Wandle's values, which are:

- Think customer
- Build relationships
- Work together
- Aim high
- Own it

It will ensure that actions we undertake will be underpinned by our vision of:

"Homes to be proud of and services you can trust"

Wandle takes allegations of Bribery very seriously and is committed to making sure the decisions we make are made with a high degree of probity. Wandle have a commitment to acting with legal and ethical integrity in all aspects of our business. We take a zero-tolerance approach to any criminal financial misconduct, whether it is committed by an employee, contractor, customer, or external party.

Scope

This policy applies to all board members, employees of the Wandle and anyone working on Wandle's behalf (Staff). Every board member, employee and associated person is responsible for maintaining high standards of business conduct. Any breach of this policy is likely to constitute a serious disciplinary, contractual, and criminal matter for the individual concerned and may cause serious damage to the reputation and standing of the Wandle.

This Policy Should be read alongside the Anti-Fraud, Theft and Corruption Policy, the Gifts and Hospitality Policy, the Anti -Money Laundering Policy, and the Whistleblowing Policy.

1.1 Policy objectives, performance monitoring and outcomes

This policy, together with other relevant policies, will assist staff and committee members to recognise bribery and engage in whistleblowing if necessary.

We require that all Board and Committee Members and staff, including permanently and fixed term employed staff, temporary agency staff and contractors:

- Act honestly and with integrity at all times and safeguard Wandle's resources, for which they are responsible
- Comply with the spirit, as well as the letter, of the Bribery Act and our policies.

Any proven act of bribery constitutes gross misconduct, which may lead to termination of membership, dismissal from employment, the ending of commercial contracts, and a criminal prosecution.

2.0 Policy Statement

Wandle requires all staff and board members to always act honestly and with integrity and to safeguard the resources for which they are responsible. Officers and employees should not place themselves under any obligation that might influence, or be perceived to influence, the conduct of their duties.

The purpose of this statement is to set out specific responsibilities with regards the prevention of Bribery.

Wandle Staff are encouraged to report any suspicions of bribery to their manager, the Assistant Director of Governance and Compliance, or may make a confidential report in line with the Whistleblowing Policy. This includes instances where a staff member is offered or asked to make a bribe. No action will be taken against an employee who makes a report that they genuinely believe to be true, even if it turns out to be unfounded. However, you may be criminally liable if you can be proven to have known about bribery within the organisation, therefore we would strongly encourage all staff to step forward to report any suspicions.

Anonymous reports will be investigated where possible but may be more difficult to progress.

Wandle commits to:

- Setting out a clear anti-bribery policy, reflecting it in the Code of Conduct for all staff and keeping the policy up to date;
- Making all Board and Committee Members and staff aware of their responsibilities to adhere strictly to the anti-bribery policy at all times;
- Training all Board and Committee Members and staff so that they can recognise and avoid the use of bribery by themselves and others;
- Encouraging vigilance and the reporting of any suspicions of bribery;
- Rigorously investigating instances of alleged bribery and assisting the Police and other appropriate authorities;
- Taking firm and vigorous action against any individual(s) involved in bribery;
- Including appropriate clauses in contracts to prevent bribery.

Wandle will take all allegations of bribery seriously and will deal robustly with those who cause or seek to cause a loss to the organisation, in line with our Code of Conduct and disciplinary policy. Where necessary and possible we will work with the police.

2.1 Detecting and investigating

All members of staff should assist the Assistant Director of Governance and Compliance, when necessary, in conducting enquiries into allegations.

Investigation of Bribery

In high-risk cases or where a Wandle worker is suspected of being involved in any of the offences detailed in this policy, the Assistant Director of Governance and Compliance will report to an ad-hoc Fraud Review Group. The makeup of this group will be at the discretion of the Assistant Director of Governance and Compliance and the Chair of the audit committee.

The group's role will be to determine the scope of the investigation, monitor progress and agree actions required. They will also determine the timing of any reports to the Audit Committee and where necessary the Regulator.

2.2 Gifts and Hospitality

All Staff, Board and Committee members must ensure that they comply with Wandle's Gifts and Hospitality procedure. This ensures that Wandle can properly monitor any gifts that are given and received by Wandle staff and ensure there can be no perception of undue favour being given to or by Wandle that could be constituted as bribery. Wandle employees should not place themselves under any obligation that might influence or be perceived to influence the conduct of their duties.

The Gifts and Hospitality register is regularly monitored and reported to the Audit committee, at least annually.

2.3 Declarations of Interest

Alongside ensuring that all Wandle staff declare gifts and hospitality, it is also important that all Wandle Staff declare any relevant interests, as outlined in our Code of Conduct. Doing so allows us to ensure a high level of probity in our actions as a business and allows us to mitigate or prevent situations that may constitute or be perceived as bribery.

Staff should declare new conflicts as they occur or where there is a change of circumstances in their employment. Further details and guidance can be found in the code of conduct and staff are encouraged to contact the Governance team for guidance or clarification as needed.

2.4 Preventing Bribery

Wandle considers internal controls to be essential in helping to prevent Bribery. Key controls include segregation of duties, declarations of interest, risk management framework, training and awareness and the internal audit programme. These are supported by key policies and procedures including Standing Orders, Whistleblowing, Gifts and Hospitality and finance policies and procedures.

2.5 Information Sharing

The Data Protection Policy must always be followed when investigating a case under this policy. The Assistant Director of Governance and Compliance will review any requests to share data for the purposes of prevention or detection.

3.0 Roles and Responsibilities

Where fraudulent activity is suspected or established, all Wandle staff are required to refer the matter to the Assistant Director of Governance and Compliance for investigation.

Managers, Human Resources and the Assistant Director of Governance and Compliance, will work together to ensure that:

- Everyone has an awareness of this policy and an understanding of internal controls which are designed to prevent and detect fraud.
- Staff participate in periodic in-house training programs covering fraud prevention and detection.
- Staff report any suspicions of fraud to their manager, the Assistant Director of Governance and Compliance or in line with the Whistleblowing Policy.
- Staff have access to the relevant policies and procedures.

Executive Director, Finance

The Executive Director, Finance is responsible for the proper administration of Wandle's financial affairs.

Assistant Director of Governance and Compliance

The Assistant Director of Governance and Compliance is responsible for ensuring all fraud allegations are properly investigated, in line with the Fraud Response plan and reported to the Audit Committee and Regulator as appropriate.

The Assistant Director of Governance and Compliance is also responsible for

- Investigating allegations of bribery committed and where appropriate ensuring appropriate action is taken against any perpetrator
- Arranging for Awareness training to take place.
- Updating this policy
- Liaising with law enforcement agencies, solicitors, accountants regarding bribery as necessary.
- Maintain the Fraud Risk Register.

Line Managers

Line Managers are responsible for ensuring that staff report suspected bribery directly to those responsible for the investigation, without fear of unlawful disclosure or retribution.

All Staff

Individual members of staff are responsible for:

- Their own conduct and for contributing towards the safeguarding of corporate standards (for example declaring any conflicts of interest or private working).
- Acting with propriety in the use of Wandle's resources and in the handling and use of corporate funds, such as when dealing with contractors and suppliers.
- Remaining Vigilant and reporting details immediately to the Assistant Director of Governance and Compliance or their line manager (if possible) if they suspect that bribery has been committed or see any suspicious acts or events.

Audit Committee

The Audit Committee are responsible for oversight of this policy, including reviewing reports and monitoring investigations.

4.0 Internal Related Documents

Key Strategy	Risk Management
Policies	Tenancy Fraud Anti-money Laundering Data Protection Disciplinary IT Acceptable Usage Whistleblowing Anti-Fraud Policy
Procedures	Fraud Response Procedure
Other documents	Code of Conduct

5.0 External Related Documents

[HCA Regulatory Framework](#)

6.0 Compliance

Governance and Financial Viability Standard

Specific Expectations

2.6 Registered providers shall ensure that any arrangements they enter into do not inappropriately advance the interests of third parties, or are arrangements which the regulator could reasonably assume were for such purposes.

This Policy ensure we comply with the above by outlining the responsibilities of staff and board members in relation to fraud and that our business is carried out with the highest degree of probity.

7.0 Legal Framework

Legislation	Main powers and relevance to <i>policy subject</i>
The Bribery Act 2010	Introduced four primary offences in a single piece of legislation: • bribing another person • being bribed • bribery of foreign public officials • failure by a commercial organisation to prevent bribery Under the Bribery Act, an organisation has a defence if it can show that it has adequate bribery prevention procedures in place. The action we take should be proportionate to the risks we face and to the size of our organisation.
The Fraud Act 2006	Deals with the general offence of fraud.
Proceeds of Crime Act 2002	Outlines how any money earned or assets acquired with the proceeds of crime can be recovered.
Criminal Finances Act 2017	Introduces corporate offences relating to the failure of an organisation's agents to prevent the facilitation of tax evasion in the UK or overseas.

8.0 Equality & Diversity

Equality & Diversity is central to our business; promoting fairness and opportunity for customers and staff; helping provide the best services shaped by and for customers; and right for recruiting and developing our staff.

We are committed to celebrating diversity. To ensure equal access to our services is available, Wandle will comply with the Equality Act 2010 and all other legislative requirements relating to equality. We will work to avoid exclusions or restrictions that are not appropriate to the housing and support needs of our tenants and that may lead to discrimination. We will endeavour to ensure that all tenants receive a consistent level of quality service.

Equality Consideration

Under the *Equality Act 2010* Wandle must consider whether our policies adversely affect our customers and/or staff.

The following table identifies whether this policy disproportionately impacts upon any individuals in regard to the key protected characteristics, as identified in the Act:

Special Characteristic	Any impact? (Yes or No)
age	No
disability	No
gender reassignment	No
marriage and civil partnership	No
pregnancy and maternity	No
race	No
religion or belief	No
sex	No
sexual orientation	No

We do not consider this policy to disproportionately impact any individuals in regard to these characteristics and therefore a detailed Equality Impact Assessment is not required.