

ANTI-BRIBERY POLICY

RESPONSIBLE DIRECTOR : Director of Resources

RESPONSIBLE OFFICER : Finance Manager - Systems

LAST UPDATE : July 2021

NEXT UPDATE July 2022

1.0 PURPOSE

1.1 The purposes of this policy are to:

1. Ensure the Group complies with the Bribery Act 2010.
2. Ensure the Group considers the risk of bribery and deals with it appropriately.
3. Ensure that all NCHA Group colleagues and organisations working with the NCHA Group understand that NCHA's policy is not to tolerate bribery in any circumstances.

2.0 RISKS

2.1. Failure to adopt and publicise an effective Anti-Bribery policy will have a number of potential consequences:

1. Failure to comply with the Act.
2. The Group leaves itself open to soliciting, accepting, offering or giving bribes.
3. The Group leaves itself open to legal and contractual proceedings as a result of actual bribery.

3.0 REFERENCES

3.1. This policy needs to be read alongside a number of other documents including:

- NCHA Handbook
- Standing Orders And Financial Regulations
- Financial Procedures Manual
- Risk Management Strategy

4.0 HOW NCHA WILL COMPLY WITH THE ACT

- 4.1. The Group will comply with the Act by:
1. Considering the risk of bribery and dealing with that risk appropriately.
 2. Having an Anti-Bribery policy.
 3. Having appropriate processes built into relevant procedures to deal with the risk of bribery.
 4. Making sure all colleagues are aware that the Group does not condone bribery in any form and that soliciting, accepting, offering or giving bribes is considered gross misconduct and will be dealt with accordingly.
 5. Making sure all colleagues are aware of the policy and procedures.

5.0 CONSIDERATION OF THE RISK OF BRIBERY

- 5.1. The Act requires that adequate consideration is given to the risk of bribery and that adequate procedures are put in place to deal with the risk.
- 5.2. In order to produce the policy a consideration of risk is undertaken. This consideration identified the key bribery risks to the Group being related to tendering and contract awards which could be exacerbated if colleagues are unaware that the Group considers bribery gross misconduct.
- 5.3. As a result of the risk consideration the following is within the Group's Financial Regulations:
1. The Group does not condone or accept bribery and will take whatever measures needed to ensure that bribery does not affect the Group.
 2. The Group has implemented a policy which details how NCHA complies with the Bribery Act 2010.
- 5.4. The NCHA Handbook states that the offering, promising, giving, requesting, agreeing to receive or accepting a bribe is considered gross misconduct.

6.0 PROCEDURES REVIEW

- 6.1. A rolling review of procedures addresses specific risks and ensures that all colleagues are aware of the Group's stance on bribery.
- 6.2. The procedures review will focus on the measures identified from the initial consideration of the risk. Should new measures be identified as a result of the work of the Risk Panel then the review process will be altered accordingly.
- 6.3. The policy itself is reviewed on a timescale determined by the assessment of the risk.

7.0 IMPLEMENTATION

- 7.1. The consideration of bribery risks forms part of the rolling risk review carried out by the Group's Risk Panel.
- 7.2. The Group's stance on bribery forms part of the induction process for new colleagues.
- 7.3. To ensure this stance is communicated to existing colleagues, this policy is within the list of policies available for viewing on the intranet, Igloo, and is briefed to colleagues at induction.

Naomi Dobrasczczyc
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9th July 2021