



CARE HOUSING ASSOCIATION ANTI-BRIBERY, GIFTS AND HOSPITALITY POLICY

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Created By	Matthew Eddisford (CEO)
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1. Policy Statement

Care Housing Association (Care) does not tolerate bribery or corruption in any form. This policy sets out how we will identify and respond to suspected bribery and protect our staff. This policy should be read in conjunction with the Whistleblowing Policy and applies to everyone working for or associated with Care including all employees and Board members.

2. Definitions

Bribery: Bribery is when a person offers, gives, receives or solicits a financial (or other) advantage to another person with the intention of inducing or rewarding that person to act improperly. The Bribery Act 2010 came into force on 1 July 2011. There are four possible offences:

- offering, promising or giving bribes.
- requesting, agreeing to receive or accepting bribes.
- bribery of a foreign public official.
- failure of a commercial organisation to prevent bribery.

Gifts: These are defined as any item of value provided or offered for personal benefit at a cost that is less than its commercial value or, no cost.

Hospitality: Covers a wide spectrum and can include free meals, drinks, receptions, meetings sponsored by associates, hospitality tents at shows, exhibitions or conferences, music and cultural events, sport and leisure events, hotel accommodation and holidays.

3. Our Positions on Bribes

We do not tolerate bribery in any form and Care employees and Board members must never:

- offer, give, request, or accept any bribe, whether in cash or by way of any other type of illicit payment, to or from any person or company.
- engage in any internal action which encourages, implies, gives, tolerates or promises and unfair, unlawful, improper or unethical advantage to any individual, group, or organisation, regardless of whether there is a financial inducement or not.

A bribe does not need to be money – it can be any form of advantage, for example the award of a contract, hospitality or gifts or an offer of employment. A recipient of a bribe does not need to benefit personally nor does the benefit need to be received – an offer or request is an offence. Any offer of or request for a bribe should be reported to senior management immediately. Any Care employee or associated person who is discovered to be giving or taking bribes or any other acts of corruption, will be subject to disciplinary action. This may ultimately lead to dismissal and, if appropriate, criminal proceedings.

4. Our Position on Gifts and Hospitality

You can accept occasional small gifts of worth £20 or less without prior permission or making a declaration. Otherwise, before accepting most gifts or hospitality you should get permission from your line manager. You must then declare what you have accepted, and this should be agreed, via email, by your line manager. If you are unsure of the value of an offered gift, or are in doubt about what is acceptable, please discuss this with your line manager and agree how to proceed.

Care will maintain a Gifts and Hospitality Register ('the register') of gifts received. It is the responsibility of each employee to declare ANY gifts to their manager, the details of which will be recorded on the register and reported to Board annually. In addition to gifts, employees must also report any instances where they have used contractors used by Care in a personal capacity, i.e. to carry out works on their own home, in order to demonstrate that it does not constitute being defined as a gift. This must also be recorded on the register.

5. Responsibility

The designated person responsible for implementation and monitoring of this policy will be the Chair of the Board.

6. Equality and Diversity

Care is committed to respecting diversity in all aspects of our work and we will not tolerate any form of discrimination.

We recognise that there is the potential for impact across the characteristics of Age, Disability, Gender Reassignment, Marriage and Civil Partnership, Pregnancy and Maternity, Race, Religion or Belief, Sex or Sexual Orientation. Hate crime is ASB which targets someone with a perceived motive being prejudice towards a person's characteristics.

Where we are made aware of or identify customers with specific needs, we will be proactive in targeting our communication and support appropriately and consider any specific needs individually.

7. Commitment and Review

Care will formally review this policy every three years or if relevant service parameters change.