



Drumchapel Housing

Co-operative Limited

Anti-Bribery Policy

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Approved by Board
Date of next Review

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CONTENTS

PAGE NO.

1. Introduction and Scope	3
2. The Bribery Act	3
3. What is Prohibited	3-4
4. Strategies and Principles Agreements	4-5
5. Roles and Responsibilities	5-6
6. Special Requirements	7-8
7. Action by the Organisation	8
8. Policy Review	8
9. Key Related Policies	8
10. UK GDPR Privacy Statement	9

1.0 Introduction and Scope

- 1.1 Drumchapel Housing Co-operative Ltd, is committed to the highest standards of ethical conduct and integrity in all its activities. To this end, it is committed to the prevention, deterrence and detection of bribery. It will not condone giving or taking bribes by any person connected with the organisation or its services.
- 1.2 DHCL acknowledges the provisions of the Bribery Act 2010 and aims to maintain compliance with this as part of its everyday business. It recognises that failure to do so is likely to seriously damage the reputation of the organisation and the housing association sector as a whole. DHCL may also face criminal liability for unlawful actions taken by its employees or associated persons.
- 1.3 This policy applies to all employees and “associated persons” including Governing Body members, temporary workers, consultants, contractors, agents and subsidiaries acting on behalf of DHCL. Breaches of this policy are likely to constitute a serious disciplinary, contractual and or criminal action for the individual(s) concerned.

2.0 The Bribery Act 2010

- 2.1 Under the Bribery Act 2010, a bribe is a financial or other type of advantage that is offered or requested with the:
 - intention of inducing or rewarding improper performance of a function or activity; or
 - knowledge or belief that accepting such a reward would constitute the improper performance of such a function or activity.
- 2.2 DHCL acknowledges that a criminal offence will be committed under the Bribery Act 2010 if:
 - an employee or associated person acting for, or on its behalf, offers, promises, gives, requests, receives or agrees to receive bribes; or
 - it does not have the defence that it has adequate procedures in place to prevent bribery by its employees or associated persons.
- 2.3 DHCL further recognises that if, as a “relevant commercial organisation,” it is found guilty under the Bribery Act it could receive an unlimited fine and potentially be excluded from tendering for public contracts. Individuals could be liable on conviction to imprisonment for up to 10 years, to a fine, or both.
- 2.4 All employees and associated persons are required to comply with this policy, in accordance with the Bribery Act 2010.

3.0 What is Prohibited?

- 3.1 DHCL prohibits employees or associated persons from offering, promising, giving, soliciting or accepting any bribe. This includes cash, a gift or other inducement made to gain personal, commercial, regulatory or contractual advantage.

3.2 In particular, it is unacceptable 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;
- retaliate against or threaten a person who has refused to commit a bribery offence or who has raised concerns under this policy;
- engage in activity in breach of this policy.

3.3 References in 3.2 to payments to, and gifts and hospitality from, third parties include indirect contributions, payments or gifts made in any manner as an inducement or reward for improper performance, for example through consultants, contractors or sub-contractors, agents or sub-agents, sponsors or sub-sponsors, joint-venture partners, advisors, customers, suppliers or others.

4. Strategy and Principles

4.1 DHCL identifies bribery as a distinct business risk, which is considered as part of its wider risk management arrangements. DHCL’s anti-bribery strategy is founded upon having in place a range of operational policies, systems and procedures that are designed to deter, and enable detection and reporting of bribery. In particular, this includes:

- the Financial Regulations, Treasury Management, Delegated Authority and Procurement policies and the controls detailed therein;
- the Standing Orders and other governance related policies, covering matters including Whistleblowing, Payments and Benefits and Declaration of Interest; and the associated management systems;
- the Codes of Conduct for Staff and Governing Body Members;
- service based policies, guidance and operating procedures covering repairs, maintenance and development activities; estates services; and tenancy related matters and staff recruitment.

4.2 In addition to this the DHCL will:

- ensure its commitment to preventing, deterring and detecting bribery is clearly articulated through relevant policies and procedures; and communicated throughout DHCL;
- ensure all Governing Body Members and staff are aware of this Anti-Bribery Policy, and the responsibilities it places on them;
- ensure Governing Body Members and staff are appropriately trained on recognising bribery and encouraged to be vigilant in this regard in performing their role within DHCL;

- have in place robust procedures to enable suspicions of bribery to be reported; and ensure all Governing Body Members and staff have an appropriate awareness and understanding of these;
- rigorously investigate all instances of alleged bribery and assist the police and other relevant authorities with their inquiries;
- take firm and vigorous action against any individual(s) involved in bribery;
- ensure procurement and contracting activities are carried out in accordance with relevant legislation, guidance and best practice, and incorporate due diligence activities as necessary;
- communicate to third parties, including actual and prospective customers, suppliers and joint-venture partners, its zero-tolerance approach to bribery, and its commitment to working only with other organisations or individuals that also commit to doing business without bribery.

4.3 DHCL also operates a separate Anti-Fraud policy outlining its approach to dealing with this discrete, but often related issue.

5. Roles and Responsibilities

Drumchapel Housing Co-operative Ltd Management Board

5.1 The Board is responsible for ensuring DHCL:

- operates an anti-bribery culture;
- maintains effective risk management and internal control systems;
- review the findings of external audit;
- has relevant policies and systems in place to deter, detect and report suspected bribery;
- ensures reported incidents of suspected bribery are promptly and vigorously investigated; and appropriate action is taken in instances where bribery is detected.

5.2 The Board is also responsible for ensuring it conducts its own affairs in accordance with the Scottish Housing Regulator's regulatory standards of governance and financial management; and recognised principles of good governance. Individual Board Members are responsible for ensuring they:

- read, understand and comply with this policy;
- remain vigilant to bribery or attempted bribery, in fulfilling their duties;
- report as soon as possible any suspicions of bribery or attempted bribery they encounter; and otherwise,
- act with integrity and propriety, within the law, and in accordance with relevant policies, systems and procedures.

Audit, Risk & Staffing sub-Committee

5.3 As detailed within its terms of reference, the Audit, Risk and Staffing sub-Committee's role includes:

- monitoring and reviewing the effectiveness of internal controls including risk management systems;
- reviewing internal audit reports;
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- monitoring and reviewing the effectiveness of internal audit activities; and also in reviewing arrangements for whistleblowing.

Senior Management Team (SMT)

5.4 SMT has collective responsibility for:

- developing and maintaining effective policies, procedures and control systems for deterring, detecting and reporting bribery; and ensuring these are both working effectively, and periodically reviewed in accordance with good practice;
- ensuring the Governing Bodies have up to date and accurate information on regulatory requirements in relation to governance and financial management, governance good practice and expected standards of conduct;
- fostering a culture of honesty and openness amongst all staff, and ensuring staff are aware of expectations relating to their professional conduct and the requirements of this policy;
- ensuring all staff have the required level of knowledge and understanding of DHCL suite of policies, procedures;
- ensuring staff receive appropriate training that enables them to identify bribery or attempted bribery;
- ensuring the notification requirements of regulators are met;
- liaising with police and other relevant authorities in relation to any inquiries into alleged bribery offences.

5.5 The Director has a particular role in relation to whistleblowing. This is defined within the Whistleblowing Policy.

All Staff

5.6 The prevention, detection and reporting of bribery and other forms of corruption is the responsibility of all staff members. Employees are required to ensure they read, understand and comply with this policy, and remain vigilant to bribery or attempted bribery, within their respective areas of work. In particular, employees must:

- report as soon as possible any suspicions of bribery or attempted bribery they encounter; and otherwise,
- act with integrity and propriety, within the law, and in accordance with relevant policies, systems and procedures.

6. Specific Requirements

Facilitation Payments

- 6.1 DHCL prohibits employees or associated persons from making or accepting any facilitation payments. These are payments made to government officials for carrying out or speeding up routine procedures. Facilitation payments are distinct from an official, publicly available fast-track process. Facilitation payments, or offers of such payments, will constitute a criminal offence by both the individual concerned and DHCL under the Bribery Act 2010.

Gifts and Hospitality

- 6.2 DHCL operates to strict procedures governing the giving and receiving of corporate entertainment, gifts, hospitality and promotional expenditure. These are detailed as part of the Entitlements, Payments and Benefits policy.
- 6.3 In all cases, gifts and hospitality must not be offered, promised or accepted to secure an advantage for DHCL or any of its employees or associated persons or to influence the impartiality of the recipient.

Charitable Donations

- 6.4 DHCL considers that sponsorships and donations can form part of its wider commitment and responsibility to the communities where it operates. DHCL Entitlements, Payments and Benefits Policy details the approach it will adopt in relation to this. This includes clearly defined authorisation, recording and registering processes.

Raising a Concern/Reporting Suspected Bribery

- 6.5 DHCL Whistleblowing Policy enables staff or Governing Body members, or any other person to raise concerns relating to conduct which they believe to be improper, illegal or immoral. All suspicions of bribery or attempted bribery should be reported in accordance with this.
- 6.6 While any suspicious circumstances should be reported, employees and associated persons are required particularly to report:
- close family, personal or business ties that a prospective agent, representative or joint-venture partner may have with government or corporate officials, directors or employees;
 - requests for cash payments;
 - requests for unusual payment arrangements, for example via a third party;
 - requests for reimbursements of unsubstantiated or unusual expenses; or a lack of standard invoices and proper financial practices.
- 6.7 Notwithstanding the provisions of the Whistleblowing Policy, the Director should be informed of all suspected or detected bribery at the earliest opportunity. Where suspicions or allegations of bribery relate to the Director,

the complaint should be addressed to the Chairperson who will in turn appoint an independent person to investigate the allegation.

- 6.8 DHCL acknowledges the requirement to report instances of whistleblowing to the Scottish Housing Regulator (SHR) as a Notifiable Event. It shall report to SHR without delay, in accordance with SHR Statutory Guidance and DHCL policy on Notifiable Events.
- 6.9 DHCL notes that where SHR is notified and makes regulatory enquiries, SHR will report to the Office of the Scottish Charity Regulator (OSCR), in accordance with legal provisions (The Charities and Trustee Investment (Scotland) Act 2005) and the associated Memorandum of Understanding between OSCR and SHR.
- 6.10 Dependent on the nature of the bribery or suspected bribery, it may be appropriate or necessary to report to other regulatory bodies.

7. Action by the Organisation

- 7.1 DHCL will, as far as possible, respond to instances of alleged or suspected bribery in accordance with the principles outlined in the Anti-Fraud Policy. This will ensure it handles all allegations and subsequent investigations in a consistent and robust manner. Employees suspected of bribery may be suspended from their duties while an investigation is being carried out. The disciplinary procedures of DHCL will be invoked where any employee is suspected of bribery. Proven allegations may result in a finding of gross misconduct and immediate dismissal. The Group may terminate the contracts of any associated persons, including consultants or other workers who act for, or on its behalf who are found to have breached this policy.
- 7.2 DHCL may also report any matter to the relevant authorities, including the Police.

8. Policy Review

- 8.1 This policy will be subject to review every three years, or sooner if it is affected by legislative or other significant changes.

9. Key Related Policies

- Anti-Fraud
- Entitlements, Payments and Benefits
- Staff Terms & Conditions
- Financial Regulations
- Governing Body Members Code of Conduct
- Board Expenses
- Notifiable Events
- Whistleblowing
- Staff Code of Conduct
- Standing Orders
- Treasury Management

10. UK GDPR Privacy Statement

- 10.1 The Co-operative will gather and use certain information about individuals in accordance with UK GDPR. Staff members have a responsibility to ensure compliance with the terms of the privacy policy and to collect, handle and store personal information in accordance with relevant legislation. The Fair Processing Notice (FPN) details how personal data is held and processed.

Drumchapel Housing Co-operative Ltd Equality Impact Assessment Tool



Name of the policy / proposal to be assessed	Anti-Bribery policy	Is this a new policy / proposal or a revision?	Revision
Person(s) responsible for the assessment	Pauline Burke		
1. Briefly describe the aims, objectives and purpose of the policy / proposal	To outline the Co-operative's policy for prevention, deterrence and detection of bribery.		
2. Who is intended to benefit from the policy / proposal? (e.g. <i>applicants, tenants, staff, contractors</i>)	The organisation and its reputation.		
3. What outcomes are wanted from this policy / proposal ? (e.g. <i>the benefits to customers</i>)	The prevention, deterrence and detection of bribery by employees and associated persons.		
4. Which protected characteristics could be affected by the policy? (Tick all that apply) <div style="display: flex; flex-wrap: wrap; padding: 0;"> <div style="width: 20%;"><input type="checkbox"/> Age</div> <div style="width: 20%;"><input type="checkbox"/> Disability</div> <div style="width: 20%;"><input type="checkbox"/> Marriage & Civil Partnership</div> <div style="width: 20%;"><input type="checkbox"/> Pregnancy/Maternity</div> <div style="width: 20%;"><input type="checkbox"/> Race</div> <div style="width: 20%;"><input type="checkbox"/> Religion or Belief</div> <div style="width: 20%;"><input type="checkbox"/> Gender</div> <div style="width: 20%;"><input type="checkbox"/> Gender Reassignment</div> <div style="width: 20%;"><input type="checkbox"/> Sexual Orientation</div> </div>			

5. If the policy / proposal is not relevant to any of the **protected characteristics** listed in part 4, state why and end the process here.

This policy is in place to prevent, deter and detect fraud by all employees of the Co-operative and any associated persons.

6. Describe the likely positive or negative impact(s) the policy / proposal could have on the groups identified in part 4	Positive impact(s)	Negative impact(s)
	n/a	n/a
7. What actions are required to address the impacts arising from this assessment? <i>(This might include; collecting additional data, putting monitoring in place, specific actions to mitigate negative impacts).</i>	No further actions required.	

Signed:



(Job title): Director

Date the Equality Impact Assessment was completed: 10 November 2025