



ANTI-BRIBERY & CORRUPTION POLICY

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1. Policy Statement

- 1.1 Eastlight Community Homes (hereafter ‘Eastlight’) is committed to conducting our work in accordance with the highest standards of ethics. We will act fairly, honestly and openly, and we will not tolerate any form of bribery or corruption.
- 1.2 The reputation of Eastlight and the sector depends on all of us acting in accordance with sound ethical principles, and we will do our utmost to ensure that this good reputation is protected.

2. Scope

- 2.1 This Policy applies to all individuals employed by Eastlight and those who are engaged by Eastlight, including apprentices, casual and temporary colleagues, agency workers, self-employed workers, contractors, suppliers and volunteers. The Policy also applies to Board Members and those on Committees.
- 2.2 It encompasses all forms of bribery and corruption, including but not limited to, financial inducements, or favours that may influence decision-making or gain unfair advantage.
- 2.3 The responsibility to control the risk of bribery or corruption resides at all levels of the organisation. It does not rest solely within assurance functions, but in all business units and corporate functions.
- 2.4 Please note that we have separate policies governing our approach to dealing with Probity and Gifts & Hospitality. Related policies include the Anti-Fraud Policy and the Anti-Money Laundering Policy.

3. Principles

3.1 Zero Tolerance

- 3.1.1 We will adopt a zero-tolerance approach towards any form of bribery and corruption. It is unacceptable to:
 - Give, promise to give, or offer a payment or a favour, 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 or a favour to a government official,

agent or representative to "facilitate" or expedite a routine procedure

- Accept a payment or a favour from a third party that you know or suspect is offered with the expectation that it will obtain a business advantage for them
- 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.

3.2 Accountability

3.2.1 All individuals associated with Eastlight are accountable for upholding and promoting integrity. We require that everyone acts honestly and with integrity at all times and safeguards Eastlight's resources and reputation.

3.3 Transparency

3.3.1 We commit to transparent practices in all our business dealings.

3.4 Protection

3.4.1 We offer protection to those who raise concerns in good faith, ensuring they are free from retaliation. Please refer to the organisation's Whistleblowing Policy for further information.

4. Definitions

4.1 Bribery involves the offer, promise, provision or acceptance of any financial or other benefit to persuade the recipient or another person to behave improperly in their duties, or as a reward for such behaviour.

4.2 Improper conduct includes illegal, unethical, or actions that contradict expectations of good faith or impartiality, or involve the misuse of a trusted position.

4.3 The term 'advantage' encompasses money, gifts, loans, fees, hospitality, services, discounts, contracts or any other valuable item.

4.4 Bribery can occur in various contexts, including business or professional engagements, public roles, employment-related activities or any actions undertaken on behalf of any type of organisation.

4.5 Corruption is the abuse of entrusted power or position for private gain.

5. Aims & Outcomes

5.1 The Policy aims to establish a clear framework for identifying and preventing bribery and corruption in all its forms, ensuring that all activities are conducted in a lawful and

ethical manner.

- 5.2 The desired outcomes include enhanced awareness of bribery risks, the establishment of robust procedures to detect and prevent corrupt practices, and the maintenance of Eastlight's integrity and reputation.
- 5.3 By achieving these outcomes, Eastlight seeks to maintain a culture of honesty and accountability, essential for its long-term success and sustainability.

6. Legal & Regulatory Context & Framework

6.1 Bribery Act 2010

- 6.1.1 The Bribery Act 2010 significantly reshapes the legal framework for anti-bribery measures in the UK. It encompasses various offences, including bribery, accepting a bribe, bribing foreign officials and corporate bribery.
- 6.1.2 The Act emphasises the importance of ethical conduct and the responsibility of organisations to prevent bribery. It also introduces the concept of 'strict liability' for businesses, making them potentially liable for actions of their associates.

6.2 Fraud Act 2006

6.3 Proceeds of Crime Act 2002

6.4 Co-operative & Community Benefit Societies Act 2014

6.5 Companies Act 2006 (Eastlight's subsidiaries)

6.6 Public Contracts Regulations 2015

6.7 Regulatory Framework for Social Housing in England from the Regulator of Social Housing

6.8 National Housing Federation's Code of Governance 2020.

7. Risk Assessment & Management Principles

- 7.1 Eastlight will conduct regular, informed risk assessments to understand potential bribery and corruption scenarios that the organisation may encounter.
- 7.2 Eastlight's management principles for dealing with bribery and corruption follow the

six principles set out in guidance from the Ministry of Justice.

7.3 Proportionality

7.3.1 Eastlight’s anti-bribery and corruption arrangements are focused on those areas where the risk is greatest, i.e. procurement and growth.

7.4 Top Level Commitment

7.4.1 The organisation is committed to conducting our work in accordance with the highest standards of ethics. The overall Policy Statement was approved by the Board.

7.5 Risk Assessment

7.5.1 We will carry out periodic assessments of the bribery and corruption risks we face.

7.6 Due Diligence

7.6.1 Eastlight’s procurement arrangements emphasise the importance of appropriate due diligence before engaging contractors or suppliers and having reciprocal anti-bribery arrangements in place with our business partners. Top management scrutiny is required before entering into joint ventures, mergers or partnership arrangements.

7.7 Communication

7.7.1 The initial rollout of the anti-bribery and corruption arrangements is supported by ongoing training.

7.8 Monitoring and Review

7.8.1 The organisation’s arrangements are subject to ongoing audit. Any incidents of actual or attempted bribery are reported to the Audit & Risk Committee and investigated.

8. Application of the Policy

8.1 Eastlight commits to:

- Setting out a clear Anti-Bribery & Corruption Policy and keeping it up to date
- Making all employees aware of their responsibilities to adhere strictly to this Policy at all times
- Training all Board, Committee Members and employees so that they can recognise and avoid the use of bribery and corruption by themselves and others
- Encouraging all employees to be vigilant and to report any suspicions of bribery and corruption, providing them with suitable channels of communication and ensuring sensitive information is treated appropriately
- Rigorously investigating instances of alleged bribery and corruption, and assisting police and other appropriate authorities in any resultant prosecution

- Taking firm and vigorous action against any individual(s) involved in bribery or corruption
 - Providing information to all employees to report breaches and suspected breaches of this Policy, making reporting methods accessible to all
 - Including appropriate clauses in contracts for services to prevent bribery or corruption.
- 8.2** Bribery is a criminal offence and can be punishable with imprisonment of up to 10 years and/or a fine. Any person found to be committing bribery may face disciplinary and legal action.
- 8.3** Reporting of suspected/actual bribery and corruption should be made to the Senior Risk & Assurance Manager. This can be via the Customer Service Centre, by telephone or email, or via the online form. All suspected/actual bribery and corruption will be reported to the Audit & Risk Committee (ARC) via the fraud register.
- 8.4** The Chief Executive will report all cases of suspected material bribery and corruption (i.e. of significant impact, having a negative financial, reputational and/or operational effect that is substantial) to the Chair of the Board and/or the Chair of the Audit & Risk Committee at the earliest opportunity.
- 8.5** The Chief Executive will present a report, as a confidential item, to the Board or Audit & Risk Committee following confirmation of a detected or attempted material bribery and corruption (i.e. of significant impact, having a negative financial and/or operational effect that is substantial) at the earliest opportunity.
- 8.6** The report should enable the Board or Committee to assess whether appropriate action has been taken and whether or not internal controls are satisfactory.
- 8.7** The report will provide the Board or Committee with information on:
- The specific circumstances of the case
 - Any loss sustained by Eastlight
 - The action(s) taken
 - The adequacy of internal controls, systems and procedures, including any independent assessment or validation of controls that has been undertaken
 - Recommendations for further action to be taken, as appropriate, including changes in systems and procedures.
- 8.8** All actual incidences of bribery and corruption will be reported in the Annual Fraud Return to the Regulator. The Chief Executive may advise the Regulator sooner if they consider the circumstances warrant this.

9. Monitoring & Review

- 9.1 Eastlight is committed to reviewing this Policy regularly to ensure it meets the legal requirements and reflects best practice.
- 9.2 This Policy will be reviewed periodically, at least every three years to ensure its effectiveness and relevance.
- 9.3 Eastlight's arrangements are subject to ongoing audit.

10. Equality Impact Assessment

- 10.1 This Policy has undergone an Equality Impact Assessment (EIA) and has been judged to be fair and in line with Eastlight's commitment to Equality and Diversity, which states that Eastlight is committed to equality and strives to be fair in its dealings with all people, communities and organisations with which it has relationships and takes into account the diverse nature of their culture and backgrounds.
- 10.2 This Policy complies with Eastlight's commitment to ensuring that no person or group of people will be treated less favourably than another person or group of people, and that we will develop and deliver services that actively take into account protected characteristics, such as:
 - Age
 - Sex
 - Gender reassignment
 - Disability
 - Racial ethnic origin
 - Religion or belief
 - Sexual orientation
 - Marriage or civil partnership
 - Pregnancy and maternity
 - Social and economic factors leading to disadvantage or exclusion.

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