



BRIBERY POLICY

call 01452 424344
email customer.experience@gch.co.uk
visit www.gch.co.uk

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DOCUMENTATION MASTER SHEET

Amendments to this Document are Detailed Below.

Version Number	Date Amended	Comments	Date Approved	Author	Approved By
01	08/02/2016	Expansion of existing policies	17/02/2016	PDM	Audit Committee
02	18/03/2019	Review of policy	01/04/2020	FH	Audit Committee
03	28/11/2022	Monior review to reference new code	28/11/2022	EB	N/A
04	31/12/2025	Review of policy with updates to job titles and the reporting to ARAC through the Compliance Assurance Statement	09/04/2026	RA	ELT
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INTRODUCTION

This policy sets out the approach to be taken in relation to Bribery.

SCOPE OF POLICY

The Bribery Policy applies equally to all board and committee members, staff, and involved customers, as well as their family members and close connections.

GCH's commitments in relation to this policy are:

- Eliminate corruption and bribery by maintaining the highest standards of good governance in all activities, supported by effective controls and clear separation of duties.
- Operate transparently and fairly, with a zero-tolerance approach to bribery. This includes ensuring full understanding and communication of the policy across board and committee members, staff, involved customers, contractors, partners, agents, and other associated persons.
- Protect GCH's reputation by preventing conduct that could lead to legal action or damage relationships with tenants, customers, business partners, colleagues, and other stakeholders.
- Work only with organisations and individuals committed to doing business without bribery.

LEGAL AND REGULATORY EXPECTATIONS

This policy aligns with the Regulatory Governance and Financial Viability Standard, the NHF Code of Governance (2020), and the NHF Code of Conduct (2022), ensuring compliance with statutory and regulatory requirements and sector best practice.

THE BRIBERY ACT 2010 AND GCH'S RESPONSIBILITIES

The Bribery Act 2010 came into force on 1 July 2011 and applies to Gloucester City Homes (GCH) and its subsidiaries (including Nerva Homes Limited). The Act sets out four principal bribery offences:

1. **Bribing another person** – offering, promising, or giving a bribe to encourage or reward improper performance of a function or activity.
2. **Being bribed** – requesting, agreeing to receive, or accepting a bribe that results in improper performance.
3. **Bribing a foreign public official** – offering or giving an advantage to influence an official in their duties.
4. **Corporate offence** – failure by an organisation to prevent bribery by someone associated with it.

A bribe is defined as “a gift or reward given, offered, or received to gain any business, commercial, or personal advantage.”

Corporate Liability

The Act introduces a strict liability offence for organisations where an associated person commits bribery to obtain or retain business or a business advantage. Strict liability means GCH can be held legally responsible even without fault or knowledge. It only needs to be proven that someone associated with GCH acted with intent to benefit GCH.

Associated Persons

Under Section 8 of the Bribery Act 2010, an associated person is anyone who performs services for or on behalf of GCH. This includes employees, agents, subsidiaries, contractors, and other partners. The definition is broad and considers all relevant circumstances, not just contractual relationships.

Penalties

Breaches of the Act can result in:

- Unlimited fines for GCH and potential exclusion from public contracts.
- Personal liability for senior officers where bribery occurred with their consent or connivance.
- Individuals convicted of bribery can face up to 10 years' imprisonment, fines, or both.

Adequate Procedures – Six Principles

GCH can defend against the corporate offence by demonstrating **adequate procedures** to prevent bribery. The Ministry of Justice guidance (updated **January 2025**) sets out six principles:

1. Proportionality – Policies and procedures must reflect GCH's size, activities, and risk profile.
2. Top-level commitment – A clear culture that bribery is unacceptable.
3. Risk assessment – Regular, comprehensive reviews of bribery risks.
4. Due diligence – Understanding who GCH does business with and ensuring partners have reciprocal anti-bribery measures.
5. Communication – Embedding anti-bribery policies in GCH's culture, not just as a tick-box exercise.
6. Monitoring and review – Ongoing audits and controls to ensure effectiveness.

Allegations or investigations will be reported to the Audit, Risk and Assurance Committee.

Attached at Appendix 1 is an Anti-Bribery 'Adequate Procedures' Checklist.

This policy is designed to address these principles and, primarily, the second key principle of demonstrating top level commitment and the fifth key principle of having clear, practical and accessible policies and procedures properly communicated to people and organisations

connected with GCH. This policy complements the other procedures we have in place to avoid bribery and corruption in GCH.

ANTI-BRIBERY REQUIREMENTS

Gifts & Hospitality Policy

This Policy must be read in conjunction with GCH's Gifts & Hospitality Policy, particularly in relation to:

- the approval of hospitality (value of £50 or above), entertainment and gifts (value of £30 and above);
- the requirement to maintain a register of declarations.

Board and Committee Members, staff and involved residents should generally not offer or accept hospitality, entertainment or gifts from persons or organisations that may benefit, or be perceived to benefit, from decisions or actions taken by GCH.

Hospitality, entertainment or gifts must never be given or received where the intention is to:

- influence GCH to award business or a business advantage;
- influence another party to provide business to GCH; or
- reward the provision or retention of business or a business advantage.

Hospitality, entertainment or gifts must not be offered to, or accepted from, government officials or representatives, politicians or political parties without the prior written approval of the GCH Chair or Director of Governance, Risk & Assurance. You must never give, promise or offer any payment, hospitality, entertainment or gift to a government official, agent or representative for the purpose of expediting or facilitating a routine procedure (for example, to accelerate a planning application).

Where you suspect that hospitality, entertainment or gifts are being offered with the expectation of a business advantage in return, you must decline the offer immediately and report the matter to the Director of Governance, Risk & Assurance without delay.

All hospitality, entertainment and gifts offered to you (whether accepted or declined), and by you (where appropriately approved), must be declared in line with GCH procedures. Unofficial payments, facilitation payments or kickbacks must never be offered or accepted under any circumstances.

Expenses Policy

All expense claims must comply with the relevant GCH policies and procedures and be supported by appropriate documentation. Specifically:

1. Board and Committee Members
 - Follow the GCH Board and Committee Members Payments, Expenses and Benefits Policy.

2. Staff

- Refer to the GCH Staff Handbook for guidance on allowable expenses and claim processes.

Dealings with Third Parties

When making payments to third parties, you must ensure:

- **Full transparency and proper documentation**
 - All payments must be accurately recorded and supported by valid receipts.
 - Records should clearly state the purpose of the payment and confirm it is reasonable and proportionate.
- **Compliance with GCH's zero-tolerance approach to bribery and corruption**
 - Inform all suppliers, contractors, and business partners that GCH does not tolerate bribery or corruption under any circumstances.
- **Restrictions during tender processes**
 - No hospitality, entertainment, or gifts should be offered to or accepted from any organisation involved in a tender with GCH while the process is ongoing.

Charitable Donations

GCH only makes charitable donations that are legal and ethical. No donation should be offered or made without the prior approval of the Director of Governance, Risk & Assurance. In making charitable donations there will be an assessment of whether it would be appropriate to make such a donation under a formal grant agreement.

Political Donations

GCH does not make political donations.

Training Requirements

Board and committee members, staff and involved residents will receive training on anti-corruption measures and the requirements of this policy, and all new board and committee members and staff will receive anti-bribery training as part of their induction.

You must attend any training you are required and, where you cannot attend a session that has been organised; you must arrange to attend an alternative session.

Advice and Support

If you are unsure how to apply any part of this policy, you must seek guidance from the Director of Governance, Risk & Assurance. Where necessary, the Director of Governance, Risk & Assurance will obtain legal advice.

Practical Procedures

To ensure transparency and prevent any concealment of improper payments, GCH requires the following:

- No unrecorded payments
All payments must be properly documented and recorded in accordance with GCH's financial controls.

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- Approval and Recording of Gifts and Hospitality
 - All employee requests for gifts or hospitality above the value of £30 must be approved by the Director of Governance, Risk & Assurance.
 - Approved items will be logged in the Gifts and Hospitality Register.
- Regular Review and Oversight
 - The Director of Governance, Risk & Assurance reviews the Gifts and Hospitality Register at least annually and alerts the ELT to any concerns.
 - On behalf of Board, the Gifts and Hospitality Register shall be formally signed off by the Chair on an annual basis and will always be available for viewing by Board and Committee Members, the Senior Leadership Group and Auditors.
 - Patterns of repeated offers from the same company will be investigated, and circumstances clarified in writing.
- Risk Management Actions
 - GCH may issue warnings or terminate contracts if there are suspicions of improper conduct.
 - Allegations or investigations relating to bribery, money laundering, criminal finance, facilitation of tax evasion, or whistleblowing will be reported to the Audit, Risk and Assurance Committee.
 - Where there are no allegations or investigations, this will also be confirmed to the Committee.

Breaches and Reporting

If you believe or suspect that a breach of this policy has occurred—or may occur—you must act immediately. Examples include:

- A contractor offering you something in return for business.
- Being offered a bribe or suspecting that one may be offered in the future.
- Believing you are a victim of unlawful activity.
- Having concerns or suspicions that a colleague may be involved in bribery or corruption.

To report this, notify the Director of Governance, Risk & Assurance at the earliest possible opportunity. If you feel uncomfortable reporting directly, raise your concerns under GCH's Whistleblowing Policy, which refers to concerns being made via the whistle blowing inbox - whistleblowing@gch.co.uk

GCH encourages openness and will support anyone who raises genuine concerns—even if they turn out to be mistaken. No one will suffer detrimental treatment (including disciplinary action, dismissal, or threats) for reporting a concern in good faith or refusing to accept or offer a bribe.

If you believe you have been treated unfairly after reporting, contact the Director of Governance, Risk & Assurance immediately.

Examples of Bribery

The following examples illustrate conduct that is unacceptable and must be reported immediately to the Director of Governance, Risk & Assurance. These examples are not exhaustive but highlight situations that could have serious consequences:

1. **Cash or Inducements**
 - An employee or Board Member is offered a cash payment or other inducement (a “cut” or “backhand”) in exchange for awarding a contract to a supplier or contractor.
2. **Lavish Gifts or Hospitality**
 - An employee or Board Member is offered an unusually generous gift or extravagant hospitality that goes beyond normal business practice.
3. **Discounted Personal Benefits**
 - An employee or Board Member is offered substantially discounted goods or services for personal use.
4. **Improper Exchange**
 - An officer accepts cash or other benefits in return for maintenance work or subcontracting arrangements.
5. **Known Bribery Risk**
 - You learn that a contractor you regularly deal with has a reputation for paying or demanding bribes.
6. **False Documentation**
 - A supplier asks you to provide an invoice or receipt when no payment is due or has been made.
7. **Cash-Only Demands**
 - A supplier insists on being paid in cash and/or refuses to sign a formal agreement.
8. **Employment for Favors**
 - A contractor offers to pay you cash to secure employment for a friend or relative.
9. **Inflated Invoices**
 - You notice an invoice for a payment that appears excessive compared to the goods or services provided.

DEALING WITH BREACHES

GCH takes any breach of this Bribery Policy extremely seriously. Compliance with this policy is essential to meet legal and regulatory obligations.

Investigation Process

- All alleged breaches will be investigated promptly and reported to the Audit, Risk and Assurance Committee, which oversees the investigation process.
- Investigations will follow GCH’s relevant procedures to ensure fairness, transparency, and compliance.

Consequences of Breach

- **Employees**
 - Breaches will be treated as a disciplinary matter under the contract of employment.
 - Sanctions may include formal warnings or dismissal.

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- This policy does not form part of any employment contract and may be amended at any time.
- **Board or Committee Members**
 - Breaches will be treated as a failure to meet duties under the Deed of Agreement for Services.
 - Sanctions will follow GCH's Code of Conduct, Standing Orders, and constitutional documents.

External Reporting

Where bribery is discovered, GCH will:

- Make a full disclosure to the Serious Fraud Office.
- Cooperate fully with any external investigation.

REVIEW

This policy will normally be reviewed triennially to ensure that it remains fit for purpose, unless an earlier review is required due to regulatory, statutory or other requirements.

Any bribery/suspected bribery will be reported to the Audit, Risk & Assurance Committee who will escalate to Board as appropriate. The Audit, Risk & Assurance Committee will be updated on a quarterly basis in relation to bribery through the General Compliance Assurance Report.

APPENDIX 1

GCH Anti-Bribery “Adequate Procedures” Checklist

Section	No.	Checklist Items	
Top-Level Commitment	1.1	Board-approved Bribery Policy with zero tolerance for bribery and corruption.	
	1.2	Anti-bribery statement published on GCH website and included in all tender documentation.	
	1.3	Director of Governance, Risk and Assurance designated as policy lead and compliance officer.	
Risk Assessment	2.1	Regular, documented risk assessments covering organisation-wide bribery risks, high-value projects, and contractor relationships.	
	2.2	Risk assessments reviewed and updated annually.	
Governance & Training	3.1	Code of Conduct explicitly prohibits bribery.	
	3.2	Mandatory anti-bribery training for Board, Committee members, staff, and involved residents.	
	3.3	Induction training for new starters.	
	3.4	Periodic refresher training covering Bribery Act 2010 guidance (Jan 2025) and Failure to Prevent Fraud offence (Sept 2025).	
Employees	4.1	Bribery defined as gross misconduct in employment terms.	
	4.2	Disciplinary policy includes termination for bribery offences.	
	4.3	Recruitment processes include anti-bribery checks for high-risk roles.	
Contractors & Third Parties	5.1	Contracts include termination clauses for bribery and audit rights.	
	5.2	Due diligence completed: ownership, financials, regulatory history.	
	5.3	Contractors confirm internal anti-bribery procedures and training.	
Tendering	6.1	Tender documents include anti-bribery statement and require disclosure of bribery or corruption offences.	
	6.2	Staff involved in tenders receive bribery risk training.	
Communication	7.1	Anti-bribery stance communicated internally and externally.	
	7.2	Policy published on website and shared with stakeholders.	
	7.3	Feedback from training reviewed for improvement.	
Financial Controls	8.1	Transparent expenses policy for all stakeholders.	
	8.2	Internal audit includes anti-bribery checks.	
Joint Ventures	9.1	Agreements reviewed for anti-bribery provisions and termination rights.	
Mergers & Acquisitions	10.1	Due diligence on potential partners to identify and mitigate bribery risks.	