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BRIBERY ACT POLICY



What is Bribery?

A bribe is an inducement or reward offered, promised or provided in order to gain any commercial, contractual, regulatory or personal advantage. If you are unsure as to whether an action is a bribe, you should contact your line manager immediately.

Regulations

We must comply with the Bribery Act 2010 including anti-corruption requirements and requirements set out in our management agreements as well as this policy and associated procedures.

Zero Tolerance Policy

We take a zero-tolerance approach to bribery and corruption and are committed to acting professionally, fairly and with integrity in all our business dealings and relationships. We are committed to upholding all laws relevant to countering bribery and corruption in all the jurisdictions in which we operate.

Gifts and Hospitality

This policy does not prohibit normal and appropriate hospitality (given and received) to or from third parties however you should first obtain authorisation from your line manager.

When assessing the practice of giving business gifts, the test to be applied is whether in all the circumstances the gift or hospitality is reasonable and justifiable. The intention behind the gift should always be considered.

What is not acceptable?

It is not acceptable for you (or someone on your behalf) 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.
 - to a government official, agent or representative to "facilitate" or expedite a routine procedure.
- accept a payment, gift, or hospitality from a third party:
 - that you know or suspect is offered with the expectation that it will obtain a business advantage for them.
 - 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.
- threaten or retaliate against another worker who has refused to commit a bribery offence or who has raised concerns under this policy; or
- engage in any activity that might lead to a breach of this policy.

Your Responsibilities

You must ensure that you understand and comply with this policy. Where you have concerns about bribery, you must notify your line manager.

Any colleague who breaches this policy will face disciplinary action, which could result in dismissal for gross misconduct. We reserve our right to terminate our contractual relationship with other workers if they breach this policy.

What are the consequences of a Bribery Offence?

Given the serious nature of bribery and corruption, offences are punishable for individuals by up to ten years' imprisonment and if we are found to have taken part in corruption, we could face an unlimited fine, be excluded from tendering for public contracts and face damage to our reputation. It is therefore imperative that all parties take their legal responsibilities very seriously.

Record-keeping

We must keep financial records and have appropriate internal controls in place which will evidence the business reason for making payments to third parties.

You must declare and keep a written record of all hospitality or gifts accepted or offered, and submit all expenses claims as required which will be subject to managerial review.

All accounts, invoices, memoranda and other documents and records relating to dealings with third parties, such as clients, suppliers and business contacts, should be prepared and maintained with strict accuracy and completeness.

How do I raise a concern?

You are encouraged to raise concerns about any issue or suspicion of malpractice at the earliest possible stage using the Whistleblowing policy. If you are unsure whether a particular act constitutes bribery or corruption, or if you have any other queries, these should be raised with your line manager.

What do I do if I am a victim of bribery or corruption?

Where this occurs, it is imperative that you tell your line manager as soon as possible. This applies if you are offered a bribe by a third party, are asked to make one, suspect that this may happen in the future, or believe that you are a victim of another form of unlawful activity.

If I raise a concern, will I receive any protection?

If you raise a concern or report another's wrongdoing, we will support you throughout the process where such concerns are genuine and are made in good faith, even if they turn out to be mistaken in the future.

We are committed to ensuring that no one suffers detrimental treatment as a result of their refusal to take part in a bribery or corruption offence, or because they have raised a genuine concern in good faith.

If you believe that you have suffered any such treatment, you should inform your line manager immediately. If the matter is not remedied you should raise a formal grievance.