

Anti-Bribery Policy

1. Introduction

OVHA has a commitment to meet its responsibilities under the provisions of the Bribery Act 2010. The Association will not tolerate bribery or corruption from employees, Board Members or anyone working on our behalf, including contractors. We are committed to carry out our business transparently and fairly and, therefore, we operate a zero-tolerance policy towards bribery.

As a Registered provider of housing with charitable status, OVHA is committed to eliminating corruption and bribery and achieving the highest standards of governance in all its activities.

2. Aims of this Policy

To ensure that OVHA prohibits:

- Offering, giving, soliciting or accepting any bribe, whether cash or another kind of inducement to or from - Any person or company, whether they are a public official or body or private person or company
- Any employee, Board member, agent or other person or body acting on our behalf, in order to gain - any commercial, contractual, financial or regulatory advantage for the Association in a way that is unethical, Any employee, Board member, agent or other person or body acting on our behalf, in order to gain any personal advantage, monetary or otherwise, for the individual or anyone connected with the individual.

3. Principles

The Principles of this policy are:

3.1 Bribery Prevention

The Association has comprehensive and inter-related procedures to compliment this policy including (not exhaustive)

- Code of Conduct
- Whistleblowing Policy
- Entitlements, Payments & Expenses
- Operational policies relating to housing applications and allocations, procurement and contracts management; and staff selection and recruitment

3.2 Proportionate Procedures

- An initial assessment of risk across the Association has been carried out
- Adequate bribery prevention procedures are proportionate to the bribery risks that the organisation faces
- Procedures are clear, practical, accessible, effectively implemented and in force
- The procedures may be stand alone or form part of a wider guidance (e.g. managing a tender process in public procurement)

3.3 Top Level Commitment

- The Associations' Board Members are committed to preventing bribery and establishing a culture within the Association in which bribery is never acceptable. This is communicated to all levels of management, employees and any relevant external factors
- The Association aims to create a zero tolerance bribery culture
- The Corporate Support Manager will oversee the development of the anti-bribery programme.

3.4 Risk Assessment

- The Association shall identify key bribery risks relevant to the business sector (e.g. deficiencies in employee knowledge, training or skills, tender process
- All information shall be documented.

3.5 Due Diligence

- The Association will apply due diligence procedures, taking a proportionate and risk-based approach
- Due diligence on any potential business partners will be carried out and used to identify the possible risk of bribery
- Appropriate disciplinary procedures have been implemented

4. Equality, Diversity & Inclusion

Ore Valley Housing Association is fully committed to equal opportunities and ensuring equality of treatment for all stakeholders, employees, customers and suppliers without discrimination or prejudice based on an individuals protected characteristics as defined in the Equalities Act as follows :-

- age
- disability
- gender identity¹
- marriage and civil partnership
- pregnancy and maternity
- race
- religion or belief
- sex
- sexual orientation

5. Monitoring and Review

- The Association monitors and reviews procedures designed to prevent bribery by persons associated with it and makes improvements where necessary
- Monitoring includes internal checks and balances as well as effective financial and auditing controls to pick up any irregularities
- This Policy shall be reviewed on a 5 yearly cycle and presented to the Board for approval.

Reviewed by: Maryjane Elder

Review date: December 2022

Next Review Date: December 2027

¹ The inclusion of gender identity as a characteristic goes beyond the confines of the Equalities Act which only recognises gender reassignment as a protected characteristic. This is referenced in our [Equality, Diversity & inclusion Policy](#).