

SHORELINE HOUSING PARTNERSHIP

Statement on Anti-Corruption and Bribery

This is a statement by Shoreline Housing Partnership as to its commitment to meet its responsibilities under the provisions of the Bribery Act 2010 which came into force on 1st July 2011

As a Registered Provider and a charity, Shoreline Housing Partnership is committed to eliminating corruption and bribery and achieving the highest standards of good governance in all its activities.

We are committed to carry out our business transparently and fairly and therefore operate a zero tolerance policy towards bribery by our board members, employees, contractors, agents and other associated persons. Incidences of bribery could lead to our reputation being damaged and also lead to deterioration in our relationship with tenants, customers, business colleagues and other stakeholders.

We are committed to working only with other organisations or individuals who also commit to doing business without bribery.

The Shoreline Board has approved a Bribery Policy which complements other policies and procedures to ensure we are best placed to achieve and maintain these high standards of corporate and individual responsibility.

We will ensure that we follow key management principles of

Proportionality – anti-bribery policies and procedures are proportionate to our activities, the sector in which we operate and the risks we face;

Top level commitment – we establish a clear culture within the Association in which bribery is unacceptable;

Risk assessment – we understand the bribery risks we face by carrying out regular and comprehensive risk assessments;

Due diligence – we make sure our partners and contractors also have reciprocal anti-bribery agreements in place;

Communication – we take measures so that all employees, board members and business partners know the procedures to follow in situations which may be sensitive to bribery and our anti-bribery policies are embedded in our culture.

Monitoring and review – we monitor our anti-bribery procedures to prevent and detect bribery – to make sure procedures are working properly and effectively

The Bribery Policy applies to all members, employees, board members and committee members of the Association at any time. The Association will apply the provisions of this Policy as they relate to all of its commercial and non-commercial arrangements and to individuals and organisations having a relationship with the Association, including contractors, agents and consultants.

We require all of these parties to familiarise themselves with this Policy and the processes and procedures contained within it, and to make sure they follow it at all times throughout their relationship with us.

We have other controls in place to prevent bribery, corruption and related inappropriate conduct. These include our:

- employee terms and conditions including contracts of employment;
- employees' Code of Conduct
- board members services agreements and job descriptions;
- board members' Code of Conduct;
- Probity (Payments and Benefits) Policy ;
- Scheme of Delegation/Standing Orders and Financial Regulations;
- Raising Concerns (Whistleblowing) Policy; and
- Contracts Standing Orders and procurement guidelines.

We take our stance on bribery as the highest of priorities. Apart from the benefits to us that all we deal with are operating on a fair and level playing field when transacting business we also are mindful of the penalties which can apply in the event of a proven case of bribery.

Prosecution under the Bribery Act could result in the Association receiving an unlimited fine and potentially the Association becoming debarred from tendering for public contracts.

Breaches of the Act could also lead to penalties for the Association's senior officers with whose "consent or connivance" bribery was committed. Individuals can be found guilty of bribery and, in the most serious cases, be liable on conviction to imprisonment for up to 10 years, to a fine, or to both.

In addition, individuals could be liable for bribing, receiving a bribe or bribing a foreign public official. Again, such individuals could be liable on conviction to imprisonment for up to 10 years, to a fine, or to both.

The Board has overall responsibility for ensuring that all of our policies and procedures are kept up to date. It has delegated to the Company Secretary the specific responsibility for maintaining general awareness of and compliance with this Anti-Bribery Policy.

This Policy will be reviewed by the Board periodically and no less frequently than every 12 months.

The Audit and Risk Committee will monitor the operation and adequacy of this Policy on a regular basis and will report to the Board on any problems.

Any person or body who has concerns about acts of bribery or what appears to be a suspicious transaction, payment or benefit given to or received by anyone whilst acting for us should contact the Company Secretary on 01472 572270 or by writing to our address in confidence for investigation under the terms of this Policy and our Raising Concerns (Whistleblowing) Policy.

If you have a general question or requirement for further information on this Anti-Bribery Policy or any of the issues covered within it, again please contact the Company Secretary.

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