



Anti-Bribery and Corruption Policy

1. Introduction

- 1.1. LRHA is committed to the highest standards of ethical conduct and integrity in its business activities. This policy seeks to prevent and prohibit bribery, in accordance with the Bribery Act 2010. LRHA will not tolerate any form of bribery by, or of, its Staff, Board, Committee Members, its temporary workers, contractors, agents, consultants or any person or body acting for or on LRHA's behalf (known as "associated persons"). LRHA is committed to implementing effective measures to prevent, monitor and eliminate bribery.
- 1.2. LRHA is committed to implementing and maintaining adequate procedures to prevent bribery, in line with UK Government guidance. These procedures are proportionate to the size, structure and activities of the organisation.

2. Aims and Objectives of the Policy

- 2.1. This policy sets out the procedures in place to prevent and prohibit bribery in accordance with the Bribery Act 2010.
- 2.2. It also sets out the responsibilities of Staff, Board, Committee Members and associated persons in observing and upholding LRHA's position on bribery and corruption.

3. What is bribery?

- 3.1 A bribe is an inducement or reward offered, promised or provided in order to improperly gain any commercial, contractual, regulatory or personal advantage, which may constitute an offence under the Bribery Act 2010, namely:
 - 3.1.1 Giving or offering a bribe.
 - 3.1.2 Receiving or requesting a bribe.
 - 3.1.3 Bribing a foreign public official.
- 3.2 LRHA may also be liable under the Act if it fails to prevent bribery by an associated person for the Association's benefit.

4. Gifts and Hospitality

- 4.1 This policy does not prohibit normal and appropriate gifts and hospitality (given or received) to or from third parties unless otherwise specifically stated. However, LRHA has internal policies and procedures which provide guidance as to what is to be regarded as normal and appropriate in terms of financial limits, subject to the principles set out below, namely that any gift or hospitality:
 - 4.1.1 Must be reasonable, proportionate and transparent, and subject to appropriate approval levels;
 - 4.1.2 Must not be made with the intention of improperly influencing a Third Party or employee to obtain or retain business or a business advantage, or to reward the provision or retention of business or business advantage, or in explicit exchange for favours or benefits;

- 4.1.3 Must comply with local law in all relevant countries;
- 4.1.4 Must be given in the name of the organisation, not in an individual's name;
- 4.1.5 Must not include cash or a cash equivalent;
- 4.1.6 Must be appropriate in the circumstances;
- 4.1.7 Must be of an appropriate type and value and given at an appropriate time taking into account the reason for the gift;
- 4.1.8 Must be given openly, not secretly; and
- 4.1.9 In the case of gifts, they must not be offered to, or accepted from, government officials or representatives, politicians or political parties, without prior approval.

4.2 What is not acceptable?

4.3 It is not acceptable to:

- 4.3.1 Accept gifts or hospitality from suppliers/contractors engaged in a procurement process or where a procurement process is imminent;
- 4.3.2 Give, promise to give, or offer, a payment, gift or hospitality with the expectation or hope that it will improperly give a business advantage, or as a reward for a business advantage already improperly given;
- 4.3.3 Give, promise to give, or offer, a payment, gift or hospitality to a government official, agent, or representative to facilitate or expedite a routine procedure;
- 4.3.4 Accept payment from a Third Party where it is known or suspected that it is offered or given with the expectation that the Third Party will improperly obtain a business advantage;
- 4.3.5 Accept a gift or hospitality from a Third Party where it is known or suspected that it is offered or provided with an expectation that a business advantage will be improperly provided by LRHA in return;
- 4.3.6 Threaten or retaliate against another person who has refused to commit a bribery offence or who has raised concerns under this policy; or
- 4.3.7 Engage in any activity that might lead to a breach of this policy.

4.4 Charitable Donation

4.5. LRHA only makes charitable donations that are legal, ethical, transparent and approved in accordance with LRHA's internal controls. Donations must not be made as a means of securing business advantage or influencing decision making.

4.6 Record Keeping

4.7. Staff, and where applicable associated persons, are required to take particular care to ensure that all of LRHA's records are accurately maintained in relation to any contracts or business activities, including financial invoices and all payment transactions with clients, suppliers and public officials. LRHA will maintain appropriate financial controls and procedures to ensure that all payments are properly authorised, recorded and subject to audit.

4.8. Staff and associated persons are required to keep accurate, detailed, and up-to-date records of all corporate hospitality, entertainment or gifts accepted or offered in accordance with LRHA's Gifts and Hospitality Policies for employees, Board and Committee members respectively. All gifts whether accepted or declined must be recorded in the Gifts and Hospitality Register.

4.9. Prior approval for higher value gifts exceeding £50 require approval from the Management Team.

4.10. Reporting Suspected Bribery

4.11. LRHA depends on its Staff, Board, Committee Members and associated persons to ensure that the highest standards of ethical conduct are maintained in all its business dealings. Staff, Board and/or Committee Members and associated persons are requested to assist LRHA and to remain vigilant in preventing, detecting and reporting bribery. LRHA encourages openness and will support anyone who raises genuine concerns in good faith.

4.12. Staff, Board, Committee Members and associated persons are encouraged to report any concerns that they may have as soon as possible. Concern can be raised to a member of the Management Team, the Audit & Risk Committee Chair or in accordance with the Whistleblowing Policy. Issues that should be reported include:

4.11.1 Any suspected or actual attempts at bribery;

4.11.2 Concerns that other Staff, Board, Committee Members or associated persons may be being bribed; or

4.11.3 Concerns that other Staff, Board, Committee Members or associated persons may be bribing third parties, such as clients or government officials.

4.13. Dealing with Breaches

4.14. Any breach of this Policy will be taken seriously and investigated promptly. Any Staff who breach this policy will face disciplinary actions, which could result in dismissal for gross misconduct. Any Board or Committee Member will be dismissed from their post, if a breach is discovered and proved. If a breach is discovered, LRHA will consider whether the severity of discovery warrants full disclosure to the Police, Regulator and the Serious Fraud Office.

5. Due Diligence

5.1. LRHA will undertake proportionate due diligence on persons who perform or will perform services for or on behalf of the organisation, in order to mitigate identified risks.

6. Operational Responsibilities

6.1. Board

- 6.1.1. Ensure LRHA complies with all applicable anti-bribery and corruption laws and regulations.
- 6.1.2. Provide oversight of risk management and internal controls relating to bribery and corruption.

6.2. Management Team

- 6.2.1. Implement this policy and ensure it is effectively communicated to staff.
- 6.2.2. Ensure appropriate controls, procedures and training are in place to mitigate identified risks.
- 6.2.3. Lead by example and promote ethical behaviour.

6.3. Staff

- 6.3.1. Read, understand and comply with this policy.
- 6.3.2. Act with honesty and integrity and avoid any activity that could lead to, or suggest, bribery or corruption.
- 6.3.3. Report any concerns, suspicions or breaches to a member of the Management Team or the Chair of the Audit & Risk Committee.

6.4. Deputy Chief Executive & Company Secretary

- 6.4.1. Maintain financial controls that reduce the risk of bribery and corruption.
- 6.4.2. Ensure accurate record-keeping of the Gifts and Hospitality Register.
- 6.4.3. Review any concerns raised and report to the Audit & Risk Committee.

7. Control Framework

- 7.1. LRHA maintains a proportionate system of internal controls to prevent, detect and respond to bribery and corruption risks:

7.2. Risk Assessment

- 7.2.1. Regularly assess the nature and extent of exposure to bribery and corruption risks particularly around procurement, contractor engagement and asset management.

7.3. Due Diligence

- 7.3.1. Undertake appropriate check in contractors, suppliers and partners before engagement.
- 7.3.2. Ensure third parties understand and agree to comply with anti-bribery expectations.

7.4. Financial Controls

- 7.4.1. Maintain clear financial procedures including segregation of duties where practical.
- 7.4.2. Require appropriate authorization for expenditure, contracts and payments in accordance with the Financial Regulations.
- 7.4.3. Ensure all transactions are accurately recorded and supported by documentations.

7.5. Gifts, Hospitality and Expenses

- 7.5.1. Maintain a register of gifts and hospitality received.
- 7.5.2. Prohibit gifts or hospitality intended to improperly influence decisions.

7.6. Conflicts of Interest

- 7.6.1. All staff and Board/Committee Members are required to declare conflicts of interest.
- 7.6.2. Maintain a register of interest.
- 7.6.3. Conflicted individuals are excluded from related decision-making.

7.7. Procurement and Contract Management

- 7.7.1. Follow the procurement policy to ensure transparent and competitive procurement where appropriate.
- 7.7.2. Clearly document decision making and selection criteria.
- 7.7.3. Monitor contractor performance.

8. Communication

- 8.1. LRHA will ensure that this policy is communicated to all Staff, Board, Committee Members and associated persons.

9. Equality and Diversity Implications

- 9.1. We are committed to fairness and equality for all regardless of their colour, race, ethnicity, nationality, gender, sexual orientation, marital status, disability, age, religion or belief, family circumstances or offending history. Our aim is to ensure that our policies and procedures do not create an unfair disadvantage for anyone, either directly or indirectly.
- 9.2. LRHA respects and values the differences of our residents, partners, and staff and LRHA will treat everyone LRHA work with fairly, and with respect. This policy has been considered in light of LRHA's equality and diversity policy and is compliant with its principles.
- 9.3. We will comply with the Equality Act 2010 and will adapt our process or make reasonable adjustments to accommodate an individual's needs wherever possible and reasonable.

10. Monitoring and Review

10.1. This policy will be reviewed every 3 years. A review may be conducted earlier if there are significant changes to either legislation or LRHA's operating practices.

11. Associated Documents / Policies

11.1. This policy should be read in conjunction with:

- 11.1.1 Fraud Risk Management Policy
- 11.1.2 Code of Conduct 2022
- 11.1.3 Whistleblowing Policy
- 11.1.4 Financial Regulations
- 11.1.5 Procurement Policy
- 11.1.6 Staff Handbook
- 11.1.7 Employment Contract

11.2. Copies of these policies are available on SharePoint and will also be covered as part of the induction process of both new staff and Board and Committee Members, where appropriate.

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