



Anti Bribery Policy

Approved: 6 March 2025



What you will find in this guidance note

1	Introduction	3
2	Purpose	3
3	Equality, Diversity, and Inclusion.....	3
4	Policy Statement	4
5	Publicising and Accessibility.....	5
6	Training and Competence	5
7	Scheme of Delegation.....	6
8	Monitoring, Reporting, and Review	6
9	Complying with the Law and Good Practice	6
10	General Data Protection Regulation (GDPR).....	6



1 Introduction

- 1.1. Our vision is a Scotland where people of all ages are respected and can make their own choices and lead independent and fulfilling lives.
- 1.2. Our mission is to improve the quality of life of older people by offering a diverse range of housing, care, and other services.
- 1.3. As part of this commitment, we take a zero-tolerance approach to bribery and corruption and are dedicated to preventing unethical practices within our organisation.
- 1.4. This policy embodies our values, which are:

Honesty
Dignity

Equality and Diversity
Integrity

Ambition
Caring

Kindness

2 Purpose

- 2.1. The purpose of this policy is to:
 - Provide clarity on our approach to anti bribery for our customers, colleagues, and Board members
 - Ensure compliance with the Bribery Act 2010 and other relevant legislation
 - Define clear procedures for identifying and reporting bribery
 - Establish key performance indicators (KPIs) and risk assessment measures to evaluate compliance.
- 2.2 This policy is linked to a number of other policies, including:
 - Entitlements Payments and Benefits Policy
 - Fraud and Theft Policy
 - Whistleblowing Policy

Colleague support and wellbeing:

- 2.3 We recognise that ethical dilemmas and concerns about bribery can cause stress. Bield is committed to fostering a supportive workplace where employees can raise concerns without fear of retaliation.
- 2.4 Our Whistleblowing Policy provides individuals with details of how to raise their concerns and outlines protections for employees reporting concerns in good faith.

3. Equality, Diversity, and Inclusion

- 3.1. When carrying out this policy we will adhere to our Equality and Diversity Policy which aims to promote diversity, fairness, social justice, and equality of opportunity. An Equality Impact Assessment was carried out in relation to this policy and this is included at [Appendix 1](#).
- 3.2. In addition to the points made above, to help promote equality and inclusion, the following steps will be taken for this policy:
 - Large print version
 - Translation and interpretation message on the back of the policy
 - Easy to read version for people with mental impairment



4. Policy Statement

- 4.1 Bribery is a specific form of corruption which is subject to the Bribery Act 2010. Bribery, for the purposes of the Act includes offering, promising or giving another person a financial or other advantage as an inducement or reward for performing their functions or activities improperly.
- 4.2 It is Bield's policy to conduct all business in an honest and ethical manner. Bield takes a zero-tolerance approach to bribery and corruption. Bield is committed to acting professionally, fairly and with integrity in all business dealings and relationships wherever it operates and implementing and enforcing effective systems to counter bribery.
- 4.3 Bield will uphold all laws relevant to countering bribery and corruption i.e. the Bribery Act 2010.
- 4.4 Bribery and corruption are punishable for individuals by up to ten years' imprisonment and a fine. If Bield is found to have taken part in corruption, it could face an unlimited fine and face irreparable damage to its reputation. Bield therefore takes its legal responsibilities very seriously.

Key Risk Areas

- 4.5. Bribery risks can arise in various aspects of our operations. The following key areas require particular attention:

Gifts, entertainment and hospitality: excessive offers may be used to exert improper influence. All gifts and hospitality must comply with Bield's Code of Conduct – Gifts & Hospitality and Entitlements Payments & Benefits Policy.

Facilitation payments: these are unofficial payments made to secure or expedite routine actions to which the payer is already entitled. Bield strictly prohibits such payments under all circumstances.

Reciprocal agreements: Any form of 'quid pro quo' arrangement is unacceptable unless it is a legitimate business arrangement that is properly documented and approved in accordance with Bield policies and procedures, including Scheme of Delegation, Financial Regulations and/or Authorisation Levels & Approval Procedures. No improper payments should be made or accepted in exchange for securing new business, retaining existing business or gaining any improper advantage.

Actions by Third Parties: Bield may be held responsible for the actions of agents, contractors, consultants, or third parties acting on its behalf. Appropriate due diligence must be conducted before engaging third parties, ensuring there is a clear business rationale supported by a formal contract. Any payments to third parties must be properly authorised and recorded.

Record keeping: Poor record-keeping can be exploited to conceal bribery or corrupt practices. Bield must maintain robust controls to ensure records are accurate, transparent and compliant with financial and governance requirements.



Employee Responsibilities

4.6 Employees must:

- Familiarise themselves with and adhere to this policy
- Declare any conflicts of interest
- Report any suspected bribery to their line manager or Directorate lead
- Seek guidance if unsure about a situation's compliance with this policy.

4.7 Any employee found to be in breach of this policy may be subject to disciplinary action, up to and including dismissal for gross misconduct, in line with Bield's disciplinary procedures. Similarly, Bield reserves the right to review and, if necessary, terminate its contractual relationship with third parties who fail to comply with this policy.

How to raise a concern

4.8 Employees who suspect bribery must report it to their line manager, Directorate lead, or through Bield's Whistleblowing Policy.

4.9 Reports will be handled confidentially, and employees raising concerns in good faith will be protected from retaliation.

What to do if you are a victim of bribery or corruption

4.10 If you are offered a bribe, asked to make one, suspect that bribery may occur, or believe you have been subjected to any other form of unlawful activity, you must report it as soon as possible. You should inform either your line manager or the Chief Operating Officer as soon as possible.

Protection

4.11 Employees who refuse to participate in bribery or report concerns will not face discrimination or disadvantage. Bield is committed to ensuring a culture where ethical conduct is upheld and safeguarded.

5. Publicising and Accessibility

5.1. The anti-bribery policy will be stored on the Bield intranet and made available to all staff.

5.2. We are happy to translate any of our policies and provide an interpreter if our customers need help.

6. Training and Competence

6.1. This policy will be shared with all staff and all managers will be responsible to ensure this policy is adhered to.



7. Scheme of Delegation

As the governing body responsible for overseeing our work, the Board provides leadership and strategic guidance. It also ensures appropriate governance is in place to support compliance with our policies and procedures. Concerning anti-bribery, its role includes approving the adoption of the Anti-Bribery Policy.

Chief Executive Responsibilities

- 7.1. The Chief Executive provides leadership and direction to ensure the organisation operates effectively across all services. This includes ensuring that an effective Anti-Bribery Policy is in place and appropriate measures in place to support compliance by all employees.

Executive Management Team (EMT) and Leadership Team (LT) Responsibilities

- 7.2. The EMT and LT are responsible for monitoring the policy and ensuring compliance with the procedures by all employees.

Employee Responsibilities

- 7.3 All colleagues should be familiar with and adhere to the Anti-Bribery Policy.

8. Monitoring, Reporting, and Review

- 8.1 The Anti-Bribery Policy will be reviewed every five years by the Audit Performance & Risk Committee and submitted to the Board for approval. The next review of the Anti-Bribery Policy is scheduled for February 2030.

9. Complying with the Law and Good Practice

- 9.1. This policy has been developed in accordance with the Bribery Act 2010, which sets out offences relating to bribery and corruption, including bribing another person, being bribed, bribing a foreign public official, and failing to prevent bribery.
- 9.2. As a Registered Social Landlord (RSL), we are regulated by the Scottish Housing Regulator (SHR) under the Housing (Scotland) Act 2010, which requires RSLs to meet the Regulatory Standards of Governance and Financial Management. This means ensuring that we operate with integrity, uphold high ethical standards, and comply with all legal regulatory requirements, including anti-bribery laws.

10. General Data Protection Regulation (GDPR)

- 10.1. We are committed to treating all personal data in accordance with our obligations under the current data protection regulations and our Privacy Policy. Details on how your data will be used, along with the legal basis for processing your data, are outlined in our Customer Fair Processing Notice.



Speaking your language - we are happy to translate our policies on request.

يمكن ترجمة سياساتنا عند الطلب
إذا كنت بحاجة إلى مساعدة ، فيمكننا توفير مترجم

**Nasze zasady mogą być przetłumaczone na żądanie.
Jeśli potrzebujesz pomocy, możemy zapewnić tłumacza**

**我们的政策可以应要求翻译。
如果您需要帮助，我们可以提供翻译**

ہے۔ جاسکتا کیا ترجمہ پر درخواست کا پالیسی ہمارى
فراہم ترجمان ایک ہم تو ہو ضرورت کی مدد کو آپ اگر
ہیں کرسکتے