

Probity Policy

1. Policy statement

We want to make sure that principles of **accountability, probity** and **openness** inform everything we do. Our Colleagues and Board members should conduct themselves with **integrity, trust** and **fairness** and must not gain inappropriate benefit from their connection with Bromford.

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- Housing & Regeneration Act 2008
 - Bribery Act 2010
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1. INTRODUCTION & OBJECTIVES

'Being Good' is part of our **DNA**. This means we should make sure we adopt the highest standard of **conduct, values and behaviour** when dealing with our colleagues, customers and anyone else we come into contact with.

Colleagues should avoid situations which could create a **conflict of interest** between their **personal interests** and the **work they do** for Bromford.

No colleague, board or committee member should get an **inappropriate benefit** from their connection with Bromford. If a conflict of interest can't be avoided then it should be **reported and managed** in accordance with our Declaration of Interests process.

By following this policy, colleagues make sure that Bromford:

- complies with **legislation** (e.g. s.122 of the Housing & Regeneration Act 2008 & the Bribery Act 2010);
- complies with **regulatory requirements**;
- meets **best practice** and, where applicable, **charity law** principles.

2. SCOPE

This policy applies to all **colleagues, board members** and their **close relatives**.

3. PRINCIPLES

Accountability

We must be able to explain **what** we do and **why** we do it and be accountable for our actions. We should **do the right thing** and be mindful of professional codes of conduct.

We want to set an example for our sector and we follow the UK Corporate Governance Code.

Probity

We must demonstrate **honesty** and **integrity** and adopt the highest **ethical standards** of personal and professional conduct in all we do.

Our decisions must be **fair** and **open**. We shouldn't treat, or appear to treat, colleagues (or their close relatives) more favourably than anyone else.

Openness

We must be **clear** and **honest** about our activities so our customers, partners and stakeholders can have confidence in us.

4. POLICY

Decision-making

Colleagues should follow the principles of accountability, probity and openness in all they do. Accounting, procurement, employment and the allocation of housing must all be done in ways which reflect the **highest professional standards**.

We will be **particularly careful** when we consider employing, giving a contract for services or providing housing to a colleague or their close relative. **No preference** should be shown to these individuals.

Our approach to decision-making is set out in the:

- Financial Standing Orders;
- Governance Framework;

- Group Delegation Framework;
- Lettings/Allocation Policy;
- Procurement Policy;
- Recruitment Policy;
- Remuneration Policy.

Conflict of interest

Colleagues should act **impartially** and shouldn't be influenced by social or business relationships. They shouldn't use their role at Bromford to further their own interests.

All board members, committee members, executives and leaders must tell the Governance Team about any **directorships** or other **significant positions of responsibility** they have outside Bromford. This includes positions held elsewhere in the housing sector or connections they might have with organisations who have contracts with Bromford.

Where a colleague's private interests conflict (or could potentially conflict) with the work they do at Bromford the colleague should **declare it**. Eligible colleagues will be asked to make an annual declaration of interest but colleagues can declare interests at any time to their line manager or the Governance Team.

All conflicts (or potential conflicts) will be treated **confidentially** and recorded in a **register** held by the Governance Team. Where a conflict has the potential to materially impact a colleague's day to day role their line manager may be informed so the conflict can be **managed at team level**.

Bribery & Fraud

Bromford will **not tolerate bribery or corruption** in any form.

We make sure our business partners understand our stance by publishing this policy and (where appropriate) by including clauses in our contracts to make this clear.

Our policies and guides make it clear that colleagues should never:

- offer, accept or demand a bribe (including excessive gifts and hospitality) in order to attract or keep business or gain any other inappropriate advantage;
- offer or give in to demands to make illicit or illegal payments to anyone we do business with;
- engage and/or pay for services we don't legitimately need or have received in line with our Procurement Policy;
- Comply with Bromford's financial, auditing and management control systems;
- make illegal or inappropriate contributions to candidates for public office or to political parties/organisations.

Our approach to dealing with **fraud** and **money laundering** is set out in our Anti-Fraud Framework and Anti-Money Laundering Policy.

Gifts and Hospitality

- **Given by Bromford Colleagues**

Money spent on gifts and hospitality should be **reasonable** and **justified**. Our Gifts & Hospitality - How To sets out **when** and **how** we

should give gifts and hospitality.

Our customers and stakeholders expect us to use our financial resources wisely - Bromford's reputation could be damaged if gifts and hospitality are given for reasons that are **inappropriate** or **unnecessary**.

The Board will set an example when using Bromford funds.

- **Given to Bromford Colleagues**

Any offer should be **carefully considered** before it is accepted.

If a gift or hospitality is accepted it should be **reasonable** and **in proportion** to the work that has been done to deserve it.

The Gifts & Hospitality - How To sets out when colleagues can **consider accepting** an offer of a gift or hospitality or when they should **politely decline** it.

A **register** is kept by the Governance Team to record gifts and hospitality that colleagues have given and received.

Payments & Benefits to Shareholders

Under s.122 of the Housing & Regeneration Act 2008, **current** or **recent shareholders** of a Bromford company can **not** be paid a gift, dividend or bonus.

Payments & benefits to Board Members and their close relatives

Only in **exceptional circumstances** will a **contract of employment** or a **contract for the supply of goods or services** be given to a Board member, an ex Board member or their close relative.

A Contract **may only be given** with the approval of the Assurance & Audit Committee, who will consider the circumstances in light of:

- statutory and regulatory requirements;
- principles of charity law and guidance;
- Bromford's Rules;
- public perception.

Openness and transparency

Bromford is committed to acting in an **open, transparent** and **accountable** way. We make sure that:

- our **public statements** and **reports** are clear, comprehensive, balanced and fully represent the facts;
- we show a willingness to be **open** with our customers and stakeholders;
- we carry out **appropriate consultation** before major changes are decided;
- we keep personal information **confidential** at all times.

Our Openness & Transparency Policy sets out our approach to communicating with our customers, partners and stakeholders and gives a list of the information we publish on our website and on Our Space.

**Confidential Reporting
(Whistleblowing)**

Our Whistleblowing Policy has been designed to give colleagues the confidence to voice any concerns or complaints they may have about:

- breaches of this policy;
- dishonesty;
- fraud;
- bribery;
- maladministration.

All matters raised under the Whistleblowing policy will be treated in the **strictest of confidence** and will be **investigated thoroughly**.

5. RESPONSIBILITIES

Board and Executive

The **Board** and **Executive** are responsible for setting a **rigorous** and **visible** example of probity and conduct for colleagues.

Board members have a duty to make sure that Bromford's assets are **kept safe** and **used appropriately**.

Company Secretary

The **Company Secretary** will oversee implementation and compliance with this policy.

Leaders

The **Executive Team** and **Leaders** will make sure that all colleagues are aware of and meet their responsibilities under this policy.

Colleagues

Colleagues must comply with this policy.

**6. MONITORING AND
REPORTING**

This policy has been approved by the **Assurance & Audit Committee**, who will review it every three years.

The **Company Secretary** will:

- Make an annual report to the Board on compliance with this policy;
 - Publish an annual report on compliance with this policy;
 - Maintain, review, and update the Assurance & Audit Committee (6 monthly) on, the Registers of (i) Interests, (ii) gifts and hospitality and (iii) Board Members Contracts.
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