



Anti-Bribery and Corruption Policy

Approved by SMT	3 April 2025
Approved by Committee/Board	Audit and Risk Committee 30 April 2025
Effective date	1 May 2025
Review date	30 April 2028
Policy developed by	Head of Governance and Company Secretary
Consultations	Senior Management Team
Associated policies/procedures	NHF Code of Conduct, Probity Policy, Gifts and Hospitality Policy, Managing Conflicts of Interest (Declarations of Interest) Procedure, Granting of Benefits (Accommodation) Policy, Granting of Benefits (Employment) Procedure, Procurement Policy, Contract Management Policy, Raising Concerns Policy, Disciplinary Policy

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Version Control

Version	Author	Date Published	Next Review	Comments
1.0	Head of Governance and Company Secretary	01 May 25	30 Apr 28	Minor changes only reflecting that this is now standalone policy rather than combined with the anti-bribery policy.

Introduction

1. Purpose

- 1.1 The purpose of this policy is to inform colleagues and board members of the approach Connexus takes to preventing bribery and corruption and how it deals with suspected cases.

What is bribery and corruption?

- 1.2 Very generally, bribery is defined as giving or receiving a financial or other advantage to encourage the receiver to perform their functions or activities improperly for the benefit of a third party or to reward that person for having already done so.
- 1.3 Corruption is the abuse of entrusted power for private gain.

Scope

- 1.4 The policy applies to the whole of the Group. This means Connexus Homes Limited, (ultimate parent) and all its subsidiaries.
- 1.5 This policy applies to all colleagues, contractors, board and committee members (including co-optees) the term Connexus includes all subsidiaries of Connexus.

2. Problem to Solve

- 2.1 Some may view bribery and corruption as financial crimes, with no apparent victims. But corruption means that public money may be diverted from helping the most vulnerable in society, power is abused, and public services suffer. Business relationships rely on trust. Bribery and corruption abuse that trust, and goods and services are not procured in a clear, ethical or transparent way.
- 2.2 Making or receiving a bribe is a criminal offence for which individuals can be imprisoned for 10 years and / or given an unlimited fine. Bribery offences include:

Bribing another person

e.g. offering, promising or giving financial or other advantage for improper performance of function).

Being bribed

e.g. requesting, agreeing to receive or accepting a financial or other advantage).

- 2.3 The Bribery Act 2010 also includes a crime of 'failure to prevent' bribery where organisations, like Connexus, may be prosecuted if they fail to prevent 'associated persons' (an employee, contractor or joint venture partner) engaging in bribery on their behalf. Organisations must demonstrate they have "adequate procedures" to prevent bribery within the organisation, or by third parties on their behalf. Failure to do so may leave Connexus exposed to unlimited fines as well as other consequences.
- 2.4 Connexus values its reputation for ethical behaviour and for financial probity and reliability. It is committed to providing the highest standard of openness, probity and accountability and operates a zero tolerance for bribery or corruption in any form. This policy makes it clear to colleagues, board members, partner organisations, contractors and potential contractors, customers and other service users as well as our regulators that Connexus takes bribery and corruption seriously and will take action against individuals where actual or attempted bribery and/or corruption is detected.

3. Methods

3.1 Statement of Intent

- 3.1.1 Connexus prohibits the offering, giving, solicitation or acceptance of any bribe, (whether cash or other inducement) to or from any person or company by any individual employee, board member, agent or other person or body acting on behalf of Connexus.
- 3.1.2 We require colleagues and others working on our behalf to always act with honesty, integrity, propriety and due care in all matters, but particularly in the protection of Connexus, its resources and its reputation. We will not condone any behaviour that falls short of these principles.
- 3.1.3 We require colleagues to follow our Gifts and Hospitality Policy and Managing Conflicts of Interests Procedure.
- 3.1.4 We will promote an open, honest and questioning culture which encourages propriety and vigilance amongst all colleagues.
- 3.1.5 We expect colleagues to report any suspected bribery or corruption, and we encourage our partners and customers to do likewise.
- 3.1.6 We will require all suppliers and contractors of Connexus to sign up to the principles of this policy and to similarly report any suspicions of bribery or corruption to us.
- 3.1.7 We will rigorously investigate allegations of bribery or corruption and where necessary assist the Police and other authorities in any resultant investigation.
- 3.1.8 We will take firm and robust action against anyone involved in any fraudulent activity which may ultimately lead to dismissal under Connexus' Disciplinary Policy and Procedure or the termination of other contracts / relationship with Connexus

and/or be subject to the involvement of the Police and judicial system in the event of criminal activity.

3.2 Roles and Responsibilities

- 3.2.1 The **Connexus Board** is responsible for establishing and maintaining a sound system of internal control that supports the achievement of Connexus' objectives, the protection of its assets and meets high standards of propriety. The system of internal control is designed to respond to and manage the whole range of risks that Connexus faces. The system of internal control is based on an on-going process designed to identify the principal risks, to evaluate the nature and extent of those risks and to manage them effectively. Managing bribery and corruption risk is seen in the context of the management of this wider range of risks.
- 3.2.2 The **Audit and Risk Committee** has delegated responsibility from the Board to provide assurance to the Board that the internal control framework is effective. The Committee reviews the Gifts and Hospitality Register annually together with declared interests and the granting of benefits as part of a probity report.
- 3.2.3 The **Executive Leadership Team** is responsible for the day-to-day management of the business including the promotion of high standards of probity and compliance with legislative requirements across the Group. Specifically, about bribery this includes:
- a) Undertaking a regular review of the bribery risks associated with the Group's activities.
 - b) The design of an effective control environment to prevent bribery and corruption.
 - c) Establishing appropriate mechanisms for reporting and responding to bribery risk issues, incidents of bribery or attempted bribery.
 - d) Making sure that all colleagues are aware of Connexus' Anti-Bribery and Corruption Policy, Gifts and Hospitality Policy, Probity Policy and Managing Conflicts of Interests Procedure.
 - e) Ensuring that appropriate anti-bribery training is made available to colleagues as required.
- 3.2.4 The **Finance Director** is responsible for delivering the policy and will be accountable for its implementation.
- 3.2.5 **Head of Governance and Risk (Company Secretary)** is responsible as the first point of contact for fraud reporting, maintaining the fraud register and making the annual fraud report to the Regulator.
- 3.2.6 **Senior Management Team** is responsible for:
- a) Ensuring that an adequate system of internal control exists within their areas of responsibility and that controls operate effectively.
 - b) Preventing and detecting bribery and corruption as far as possible
 - c) Assessing the types of risk involved in the operations for which they are responsible.
 - d) Documenting and reviewing the control systems for which they are responsible regularly.
 - e) Ensuring that controls are being complied with, and their systems continue to operate effectively.

3.2.7 **Every colleague** is responsible for:

- a) Acting with honesty and integrity in the use of Connexus' resources and the handling and use of funds whether they are involved with cash, receipts, payments or dealing with customers, suppliers or contractors.
- b) Conducting themselves in accordance with the values and expectations of Connexus.
- c) Complying with related Connexus policies and procedures.
- d) Being alert to the possibility that unusual events or transactions could be indicators of bribery or corruption.
- e) Reporting details immediately if they suspect that bribe has been offered or received or become aware of any suspicious acts or events.
- f) Cooperating fully with whoever is conducting internal checks or reviews or investigations.

3.2.8 All **contractors, consultants and partner organisations** are responsible for operating in accordance with this policy when delivering services to or on behalf of Connexus.

3.3 **Prevention**

3.3.1 *Risk Assessment*

- a) Connexus will identify areas where there might be a risk of bribery and corruption through an annual risk assessment undertaken by the Senior Management Team and co-ordinated by the Head of Governance and Risk.
- b) The assessment will be subject to partial review between annual reviews in the event of an incident, change in process or the identification of a control weakness.

3.3.2 *Training and Awareness*

- a) Connexus will provide anti-bribery and corruption awareness training to all colleagues.
- b) Connexus will promote awareness of the Anti-Bribery Policy, Gifts and Hospitality Policy and Managing Conflicts of Interest Policy and, for new colleagues, ensure that this forms part of induction training.
- c) Connexus will encourage colleagues to be vigilant and remain alert to the risk of bribery and corruption both within Connexus and in organisations with whom we work and report any matters of potential concern.
- d) Connexus will ensure that colleagues are aware of our Raising Concerns Policy, which encourages them to raise genuine concerns about bribery and corruption or breaches of related policies without fear of recrimination.

3.3.3 *Internal controls*

- a) Connexus's internal control framework is set out in the Standing Orders and Financial Regulations (SOFR) and provides general, organisational procedures which will assist in the prevention of bribery. The SOFR is supported by a set of published policies and procedures which are published on the intranet, and which must be followed by all colleagues. Those policies and procedures which support the prevention of bribery and corruption are listed on the front page of this policy.

- b) We require all suppliers and contractors of Connexus to sign up to the principles of this policy, comply with our procedures and to report any suspicions of bribery and corruption to us.

3.4 Gifts and Hospitality

Gifts and hospitality are a high-risk area for bribery. To manage the risk Connexus has a Gifts and Hospitality Policy which must be followed by all colleagues.

3.5 Conflicts of Interests

- 3.5.1 A conflict of interest creates corruption risk when a colleague or contracted third party breaches the duty owed to Connexus by acting to favour another interest and does not advise Connexus of this. It can occur in any situation where an individual or organisation can exploit a professional or official role for personal or other benefit.
- 3.5.2 Connexus sets out its approach to managing conflicts of interest in section 5 of the Probity Policy and the Managing Conflicts of Interest Procedure. All colleagues must comply with this policy and procedure.
- 3.5.3 In addition, colleagues involved in procurement activities must comply with the Procurement Procedure and declare any conflicts of interest.

3.6 Managing Colleague Benefits

- 3.6.1 To avoid any suggestion of impropriety including bribery and corruption in the recruitment process, Connexus has developed a Granting of Benefits (Employment) Policy and Procedure for the recruitment and selection of individuals who have a “close connection” to Connexus.
- 3.6.2 To avoid the risk of allegations about the allocation of Connexus accommodation to colleagues or their close connections, Connexus has adopted a Granting of Benefits (Accommodation) Policy. This reflects the requirement of the NHF Code of Conduct adopted by the Board.

3.7 Detection and Reporting

- 3.7.1 Colleagues are required to report any cases of suspected bribery or corruption to the Head of Governance and Risk or through the Raising Concerns Policy, as soon as possible and in the knowledge that their concerns will be taken seriously and investigated appropriately. Their confidentiality will be respected if there are concerns about repercussions.
- 3.7.2 Where it becomes apparent during an investigation that a colleague was aware of bribery or corruption but did not report it, the non-reporting may be treated as a breach of this policy. Where a colleague agrees to receive or accepts a benefit to do something they wouldn't usually this is likely to be a regarded being bribed and must be reported immediately to avoid the offence.

3.8 Investigation

Connexus will investigate all reports of suspected bribery and corruption. External investigations may be undertaken. Where there is evidence of criminal activity the matter will, in all cases, be referred to the Police.

4. Measurement

- 4.1 The effectiveness of the design and implementation of this policy will be subject to independent assessment through the internal audit programme as directed by the Audit and Risk Committee.
- 4.2 Any reported incidents of bribery and corruption will be reported to the Audit and Risk Committee.
- 4.3 Declarations of interest and benefits are monitored by the Governance Team and reported annually to the Audit and Risk Committee as part of the annual probity report.
- 4.4 The Gifts and Hospitality Register is reviewed annually by the Audit and Risk Committee.

5. Review

- 5.1 Connexus will review this policy at least every 3 years to ensure the policy reflects changes in regulatory guidance and good practice. A review will be carried out sooner should there be any changes to legal requirements.

Appendix 1 – Equality Impact Assessment Form



Equality Impact Assessment Form

Strategy / policy / procedure / service / function / project being assessed	Anti-Bribery and Corruption Policy
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Stage 1 Lead officer	Interim Governance Consultant and Company Secretary	
Date of assessment	27 March 2025	
Date for next review	April 2028	
Reason for assessment	Revised policy – first EIA	
Agreed and signed off by lead officer's line manager	Manager's signature	Date

Stage 2 Aims of the service / function / policy/project under assessment	To set the tone for zero tolerance for bribery and the approach to prevent and report bribery and corruption.	
Main stakeholders / beneficiaries	All stakeholders benefit from a strong anti-bribery and corruption approach but colleagues are the main focus of this policy.	
Who is likely to be affected by the service/ function/ policy/project?	Primarily colleagues. But policy sets out our approach when third parties seek to bribe Connexus.	
What are the arrangements for monitoring and reviewing the actual impact of the service/function/policy/project?	Monitoring declarations of interest and gifts and hospitality reporting to ARC.	

Stage 3 Collect and evaluate the evidence				
Key questions	Positive impact	Negative impact	No specific impact on any one group	Evidence
Does the policy or service have a positive or negative impact on any racial groups? Describe how and which.	No	No	Yes	
Does the policy or service have a positive or negative impact on individuals where English is not their first language? Describe how and which.	No	Potential		The policy, like all Connexus policies, is written in English. Where a colleague does not speak English as their first language, there will need to be a means of ensuring they understand the policy. The same applies to all Connexus documents (policies, risk assessments etc)
Does the policy or service have a positive or negative impact on women or men? This includes Transgender people / Trans people. Describe how and which	No	No	Yes	
Does the policy or service have a positive or negative impact on people with disabilities? Describe how and which	No	Potential		Colleagues who suffer from dyslexia or other conditions affecting their ability to read / comprehend the written word may need reasonable adjustments to ensure the policy is brought to their attention and they can apply it. In particular, the method of raising concerns is via email which potentially some colleagues with disabilities may find difficult.
Does the policy or service have a positive or negative impact on people of a particular age? (e.g. children, young people, older people). Describe how and which	No	No	Yes	
Does the policy or service have a positive or negative impact on people of a particular age? (e.g. children, young people, older people). Describe how and which	No	No	Yes	

Key questions	Positive impact	Negative impact	No specific impact on any one group	Evidence
Does the policy or service have a positive or negative impact on people of a particular age? (e.g. children, young people, older people). Describe how and which?	No	No	Yes	
Does the policy or service have a positive or negative impact on people with particular sexuality / sexual orientation? Describe how and which	No	No	Yes	
Does the policy or service have a positive or negative impact on people in terms of marriage/civil partnership status? Describe how and which	No	No	Yes	
Does the policy or service have a positive or negative impact on people with a particular religion or belief? Describe how and which	No	No	Yes	
Does the policy or service have a positive or negative impact on people in terms of pregnancy/maternity? Describe how and which	No	No	Yes	
Is it possible that the service/function/policy could discriminate or unfairly disadvantage those that do not have access to digital equipment?	No	No	Yes	
Is it possible that the service/function/policy could discriminate or unfairly disadvantage or cause an individual/community financial hardship?	No	No	Yes	

Outsourced services	
If delivery of your strategy, policy, project or service is partly or wholly provided by external organisations / agencies, please list any arrangements you plan, to ensure that they promote equality and diversity.	N/A
Relations between different equality groups	
Does your assessment show that a policy, project or service may have a differential impact between any discrete groups? If yes, please explain how this issue is going to be tackled.	No

Stage 4 – Summary of replies from individuals and stakeholders consulted, including any previous complaints on equality and diversity issues about the policy or service
No consultation undertaken.
Stage 5 – Options resulting from this equality impact assessment, including measures necessary to minimise or remove any adverse impact and better promotion of equality and diversity. Consider any alternative solutions
None required.
Stage 6 – Arrangements for regular monitoring of the impact of the policy, project or service
See Stage 2
Stage 8 – Any actions and outcomes, including how these are to be communicated both internally and externally as required
Policy to be communicated in standard way.