



FRAUD AND BRIBERY POLICY STATEMENT

Plymouth Community Homes is committed to the highest ethical standards and sound governance arrangements and adopts a zero tolerance to fraud and bribery.

The conduct of employees, board and committee members and others involved in delivering PCH's business activities forms an essential part of these ethical standards and governance arrangements.

General rules relating to conduct and disciplinary action are contained within employment terms and conditions and board and committee members' service level agreements.

In addition, specific policies relating to conduct and probity are contained within our policy framework, which apply to all staff and board and committee members. PCH's Governance Standards and policy framework complies with the National Housing Federation's 'Excellence in Standards of Conduct' Code for members (Jan 2010).

PCH, through its procurement arrangements also requires any third parties involved in delivering its business activities, to comply with this anti-fraud and bribery policy statement or to have in place similar anti-fraud and bribery arrangements.

PCH will not tolerate fraud or bribery in any form, including any internal action which encourages, implies, bestows, tolerates or promises an unfair, unlawful, improper or unethical advantage to any individual, group or organisation, regardless of whether there is financial inducement or not.

Similarly, PCH will not tolerate the acceptance of bribes to induce a favourable decision, transaction or outcome. Key measures designed to eliminate or reduce the likelihood of fraud and bribery include: existing financial controls, procurement, recruitment and tenancy allocation procedures, internal and external auditing procedures.

PCH is committed to ensuring that it has adequate controls to counter money laundering activities and terrorist financing activities, in line with the Money Laundering Regulations 2007.

Additional controls include policies and procedures relating to probity, gifts & hospitality, declarations of interest, anti-money laundering, fraud and bribery prevention and detection, confidential reporting (whistleblowing) and the enforcement of disciplinary procedures where appropriate.

REPORTING FRAUD and BRIBERY CONCERNS

PCH maintains two important policies in connection with reporting of actual or potential fraud or bribery concerns:

- The Anti-Fraud Bribery and Corruption Policy, and
- The Whistleblowing Policy

In the first instance, any suspicion of fraud or bribery or other irregularity should be reported, as a matter of urgency, to:

- A member of the Executive Management Team
- A senior member of staff.
- The Head of Governance.
- Via the Whistleblowing Policy.

REPORTING OUTCOMES

Any allegation of fraud or bribery will be thoroughly investigated and will result in appropriate disciplinary or other action where substantiated and will be reported to the Police where appropriate