



KINGDOM
Group

Anti Fraud Bribery & Corruption Policy

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ANTI FRAUD, BRIBERY & CORRUPTION POLICY

1. Policy Statement

The Kingdom Group (Kingdom) incorporating Kingdom Housing Association and its subsidiaries, Kingdom Support & Care and Kingdom Initiatives are committed to eliminating corruption and bribery and achieving the highest standards of good governance in all our activities.

This policy applies to all employees, including consultants, contractors, agency staff, bank staff and all Board Members across the Kingdom Group.

This policy aims to raise awareness of the risks and the need to manage, monitor and control processes, mitigate risks and prevent fraud, bribery and corruption.

Kingdom is responsible for significant amounts of finance and other resources. There is a high overall value of organisational assets; there are large amounts of money received and paid out and there is a high volume of supporting contractual and financial transactions. There is always a risk that dishonest people will try to defraud Kingdom or its stakeholders.

We are committed to operating to the highest ethical standards and sound governance arrangements and adopt zero tolerance to fraud and bribery.

We 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 incentive or not.

We will not tolerate the acceptance of bribes to induce a favourable decision, transaction or outcome.

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

Any suspicion of fraud, bribery or other irregularity should be reported, as a matter of urgency.

In line with our commitment to diversity and inclusion, this policy can be made available in a variety of formats, including large print, translated into another language or other media. We will make any reasonable adjustments to assist you if you have a disability.



2. Definitions

Various definitions of Fraud, Bribery & Corruption exist, for the purposes of this policy the following is provided;

Fraud – ‘any intentional act or omission designed to deceive others, resulting in the victim suffering a loss and/or the perpetrator achieving a gain’.

Bribery – ‘as giving or receiving a financial or other advantage, in connection with the improper performance of a position of trust, or a function that is expected to be performed impartially or in good faith’.

Corruption – ‘includes bribery, which is the offering, promise or giving and the requesting or accepting of a bribe’.

Theft - ‘a person is guilty of theft if they dishonestly appropriate property or resources belonging to another with the intention of permanently depriving the other of it’.

3. Accountability

All Board Members and employees have a responsibility to act honestly and to follow procedures and controls to mitigate bribery, fraud and theft. They must not bypass or avoid using these procedures or controls. They must report immediately, any incident of fraud or theft whether it is suspected or actual.

The responsibility for ensuring the existence of an appropriate policy and procedures lies with the Audit, Finance & Risk Committee and the Board of Management.

The Governing body members have a responsibility to ensure Kingdom is solvent, well-run and delivers the outcomes for the beneficiaries for which it has been set up and they also have a legal duty to safeguard the money and assets.

The Chief Executive is responsible for ensuring that Kingdom’s assets are protected.

To demonstrate accountability, we will:

- Ensure there are appropriate internal and financial controls in place to make sure all funds are accounted for,
- Keep proper and adequate financial records,
- Take appropriate actions to protect funds,
- Act responsibly.



4. **Detection & Prevention**

In an attempt to eliminate fraud, bribery and corruption, Kingdom will seek to apply a cost effective way to detect and prevent fraud, bribery and corruption, through procedures and processes.

Risk exposure will be assessed periodically to identify potential events that require mitigation. The SMT and Departmental Managers will record the key risks and mitigation measures in the risk register.

Prevention techniques and control measures will be established, where feasible, to mitigate the possible impacts on Kingdom.

Detection techniques and practices will be applied to uncover fraud, bribery and corruption events when preventative measures fail or unmitigated risks are realised.

5. **Monitoring**

The Senior Management Team (SMT) will monitor the implementation and operation of this policy.

This policy will be reviewed 5 years from the date in which the policy is approved by the Committee, or earlier if deemed appropriate. In the event that this policy is not reviewed within the above timescales, the latest approved policy will continue to apply.



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Policy drawn up with reference to:

- Scottish Housing Regulator Guidance on Notifiable Events
- Scottish Housing Regulator, Regulatory Standards of Governance & Financial Management
- The Bribery ACT 2010

Reference made to similar policies from:

- Partick Housing Association

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