

Anti-bribery and corruption policy

This policy makes reference to “Bromford Flagship LiveWest (BFL)” as Flagship Housing Limited (Flagship) is the sole corporate member of Hopstead (and BFL Limited is the parent of Flagship) and, Hopstead is part of the BFL Group. In addition, the Trustees may, from time to time, and so long as it is in the best interest of Hopstead, share resource with Flagship and/or BFL by delegating some of its functions to a team within Flagship and/or BFL. The Trustees have decided that it is in the best interest of Hopstead to delegate some functions in relation to this Policy to the BFL Group Insurance and Financial Crime Manager and the BFL Audit and Risk Committee to ensure an aligned approach across the Group.

This policy sets out Hopstead’s approach to addressing fraud in support of delivering safe, fair, and responsive services to our service users. It is underpinned by legal duties, regulatory expectations, and a commitment to fairness, accountability, and transparency.

Department	Hopstead
Policy Owner	Hopstead Director of Operations BFL Group Insurance and Financial Crime Manager
Approved Date	March 2026
Date for Review	February 2029
Approving Body	Hopstead Board
Associated Legislation/Regulation	Bribery Act 2010 Criminal Finances Act 2017 Data Protection Act 2018 Economic Crime and Corporate Transparency Act 2023 Fraud Act 2006 Human Rights Act 1998 Money Laundering, Terrorist Financing and Transfer of Funds (Information on the Payer) Regulations 2017 Public Interest Disclosure Act 1998 Proceeds of Crime Act 2002
Legal Advice From	None required
Equality Impact Assessment Date	March 2026
Version Number	1.0
Publication Status	website and Intranet

1. Purpose / Principles

Hopestead is committed to preventing bribery and corruption and fostering a culture of honesty, integrity, and transparency. We maintain a zero-tolerance approach to all financial crime and expect all colleagues to act with honesty and always uphold the highest ethical standards.

2. Scope

This policy applies to all confirmed or suspected instances of bribery and corruption involving Hopestead colleagues, as well as any individuals or organisations with whom we maintain a business relationship, this includes associated persons working for, or on behalf of Hopestead.

3. Roles / Responsibilities

Hopestead Board has overall responsibility for this policy and holds ultimate accountability for regulatory reporting, even where operational responsibility is delegated.

The Hopestead Board delegate responsibility for this to the BFL Audit & Risk Committee (ARC).

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- Reviewing this policy to ensure its continued relevance and effectiveness
- Making recommendations to the BFL Board and Hopestead Board regarding financial crime risk management and related controls
- Maintaining oversight of financial crime risk management and internal controls across the BFL Group
- Approving the BFL Group annual financial crime workplan and reviewing progress
- Approving the BFL Group annual report to the Regulator of Social Housing (RSH), including the register of investigated fraud cases and detailing losses from fraudulent activity

The BFL Group Financial Crime and Insurance Manager is responsible for:

- Overall responsibility for the coordination and execution of all anti-financial crime activities across the BFL Group
- Leading the delivery and communication of financial crime prevention, detection, deterrence, and investigation initiatives, in alignment with the financial crime framework across the BFL Group
- Providing regular reports, fraud-related management information, and updates on progress against the financial crime framework across the BFL Group

All colleagues are responsible for the following:

- Act in accordance with the principles outlined in this policy
- Demonstrate Hopestead's values and behaviours consistently in their day-to-day activities
- Report immediately any suspicions or evidence of irregular, improper, or behaviours that indicate any form of financial crime
- Exercise propriety and accountability in the use of Hopestead's resources, including the handling of funds and interactions with contractors, suppliers, and service users

4. Policy Content

What is bribery and corruption

Bribery is defined under the UK Bribery Act 2010 as the offering, promising, giving, requesting, or accepting of a financial or other advantage with the intention of inducing or rewarding improper performance of a relevant function or activity. This includes actions that breach expectations of integrity, impartiality, or trust.

Corruption refers more broadly to dishonest or fraudulent conduct by those in power, typically involving bribery, abuse of office, or manipulation of processes for personal gain.

Hopstead is committed to investigating all instances of actual, attempted, or suspected bribery and corruption, and will take appropriate action to recover any funds or assets lost as a result. This policy reinforces Hopstead's zero-tolerance stance on bribery and corruption and ensures that all colleagues understand their role in maintaining a transparent and trustworthy working environment.

Policy commitment

This policy underpins our commitment to ethical conduct and responsible governance by:

- Safeguarding colleagues, service users, third parties, assets, and resources from misuse or misappropriation
- Promoting a culture of honesty, integrity, and accountability across all levels of BFL Group
- Ensuring compliance with legal, regulatory, and contractual obligations, including reporting requirements to the Charity Commission
- Supporting a consistent and initiative-taking approach to bribery and corruption prevention, deterrence detection, investigation and seeking redress

We are fully committed to complying with the UK Bribery Act 2010 and maintaining the highest standards of ethical conduct. To support this commitment, we:

- Prohibit all forms of bribery and corruption, whether direct or indirect, across all areas of our operations
- Implement and maintain robust procedures to prevent bribery, in accordance with the Act's six guiding principles: Proportionality, Top-level commitment, Risk assessment, Due diligence, Communication (including training), and Monitoring and review
- Foster a culture of integrity, transparency, and accountability, ensuring that ethical behaviour is embedded in our decision-making and business practices
- Take appropriate disciplinary and legal action against any colleague or associated person found to be involved in bribery or corrupt activities

Examples of bribery and corruption

These examples are not exhaustive but are intended to highlight common scenarios that may breach the Bribery Act 2010:

- A colleague offers a regulatory or government official a gift or payment to influence the outcome of a regulatory inspection or to secure a business advantage
- A bribe is made through a third party, such as a consultant or agent, to conceal the true nature of the payment and its intended influence

- Providing or receiving excessive or lavish entertainment to with the intent to influence a business decision, especially where there is no legitimate business justification
- A procurement colleague or other colleague in a position to do so awards a contract to a company owned by a relative, bypassing fair tendering procedures and failing to declare a conflict of interest
- A colleague manipulates financial records to divert public or company funds for personal use or to benefit an external party
- A leader appoints a friend or family member to a role without following proper recruitment procedures, ignoring merit-based selection
- A colleague receives a hidden payment from a supplier in return for awarding them a contract or favourable terms
- A colleague deliberately withholds information or misleads internal or external investigators to protect themselves or others involved in corrupt activities

5. Reporting

The Charity Commission requires charities to report serious incidents. A serious incident is an adverse event, whether actual or alleged, which results in or risks significant:

- harm to a charity’s beneficiaries, staff, volunteers or others who come into contact with the charity through its work;
- loss of a charity’s money or assets;
- damage to a charity’s property; or
- harm to a charity’s work or reputation.

For the purposes of this reporting, “significant” means significant in the context of the particular charity, taking account of its staff, operations, finances and/or reputation.

6. EIA statement

An Equality Impact Assessment was undertaken for this policy on March 2026.

We recognise that we may not have identified all adverse impacts on one or more protected characteristics. We welcome any feedback on, or examples of, things that we may have overlooked so that we can continuously improve our policy.

7. Training statement

This policy will be trained out to all colleagues by e-learning for mandatory training every two years.

8. Measuring Effectiveness

The effectiveness of this policy will be measured through self-assessment and independent scrutiny by periodic internal audit reviews and oversight by BFL Risk and Regulation Group, BFL Executive Disclosure Committee and BFL Audit and Risk Committee.

9. Review Period

This policy will be reviewed every three years by the BFL Group Insurance and Financial Crime Manager or sooner in response to significant regulatory or organisational changes. Any material amendments to this policy will require approval of the Hopestead Board.

FOR INTERNAL USE ONLY –

Supporting documents

This policy is supported by:

- Equality Impact Assessment

Version Control

Note: minor updates approved by delegated authority increase version number by 0.1; major updates and formally approved versions increase version number by 1.0.

Version	Detail	Approved by	Date
1.0	First issue to align with Group BFL Anti-Bribery and Corruption policy	Hopestead Board	March 2026