



Anti-Bribery Policy

2022-2024

Anti-Bribery Policy

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Brief Policy Summary:

This Policy sets out LHP's approach to preventing and mitigating the risks of bribery, and where instances occur to have clear investigation plan and processes to deal with them. The Policy provides direction and help to colleagues who may identify suspected bribery.

This policy details the arrangements made for such concerns to be raised.

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1. Introduction

- 1.1. The Bribery Act 2010 covers all sorts of bribery, the offering and receiving of a bribe, directly or indirectly, whether or not it involves a public official, in the UK or abroad. There are offences by individuals (and a corporate offence for corporates and partnerships), and penalties for non-compliance are serious.
- 1.2. Bribery is a criminal offence for both individuals and commercial organisations and can be punished with imprisonment of up to 10 years or unlimited fines. If any employee was accused of bribery, Lincolnshire Housing Partnership's (LHP) reputation might be damaged, and subsequent enforcement action will be time-consuming and hinder LHP from focusing on its core business and service delivery.
- 1.3. The overall aims of this policy are to:
 - improve the knowledge and understanding of everyone in the organisation, irrespective of their position, about the risk of bribery and its unacceptability.
 - assist in promoting a culture of openness and an environment where colleagues feel able to raise concerns sensibly and responsibly.
 - set out the organisation's responsibilities in terms of the deterrence, prevention, detection and investigation of bribery and corruption; and
 - ensure the appropriate sanctions are considered following an investigation, which may include any or all the following:
 - Criminal prosecution.
 - Civil prosecution; and/or
 - Internal/external disciplinary action (including professional/regulatory bodies).

2. Scope

- 2.1. This policy relates to all forms of bribery which are prohibited by LHP.
- 2.2. This policy applies to all employees, Board and Committee members, agency staff, consultants, contractors, volunteers and/or any other parties who have a business relationship with LHP – collectively referred to as colleagues in this policy.

3. Definitions

- 3.1. **Bribery** – 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. (Bribery Act 2010). Including:
 - Bribery of another person.
 - Accepting a bribe; Bribing a foreign official; and
 - Failing to prevent bribery.

4. Policy

- 4.1 LHP is absolutely committed to maintaining an honest, open, and supportive atmosphere, to best fulfil the objectives of the organisation. It is committed to a zero tolerance of bribery within the organisation with a rigorous investigation of any such allegations and to taking appropriate action against wrong doers, including possible dismissal and criminal prosecution.
- 4.2 Off-the-book accounts and false or deceptive booking entries are strictly prohibited. Under the Probity Policy all gifts, payments or any other contribution made, whether in cash or in kind, must be documented, regularly reviewed, and properly accounted for on the books of LHP. Record retention and archive policies must be consistent with LHP's accounting standards, tax and other applicable laws and regulations.
- 4.3 LHP procures goods and services ethically and transparently with the quality, price and value for money determining the successful supplier / contractor, not by receiving (or offering) improper benefits. LHP will not engage in any form of bribery, neither in the UK nor abroad.
- 4.4 Colleagues will not request or receive a bribe from anybody, nor imply that such an act might be considered. This means that you will not agree to receive or accept a financial or other advantage from a former, current, or future client, business partner, contractor or supplier or any other person as an incentive or reward to perform your function or activities improperly.
- 4.5 Bribing anybody is absolutely prohibited. This means that colleagues will not offer, promise, reward in any way or give a financial or other advantage to any person in order to induce that person to perform his/her function or activities improperly. It does not matter whether the other person is a UK or foreign public official, political candidate, party official, private individual, private or public sector employee or any other person (including creating the appearance of an effort to improperly influence another person).
- 4.6 LHP may, in certain circumstances, be held responsible for acts of bribery committed by intermediaries acting on its behalf such as subsidiaries, clients, business partners, contractors, suppliers, agents, advisors, consultants or other third parties. The use of intermediaries for the purpose of committing acts of bribery is prohibited.
- 4.7 All intermediaries shall be selected with care, and all agreements with intermediaries shall be concluded under terms that are in line with this policy. LHP will contractually require its agents and other intermediaries to comply with the Anti-Bribery Policy and to keep proper books and records available for inspection by LHP, auditors or investigating authorities. Agreements with agents and other intermediaries shall always provide for the necessary contractual mechanisms to enforce compliance with the anti-bribery regime. LHP will monitor performance and, in case of non-compliance, require the correction of deficiencies, apply sanctions, or eventually terminate the agreement even if this may result in a loss of business.

- 4.8 All colleagues should be aware that bribery will normally, dependent upon the circumstances of the case, be regarded as gross misconduct thus warranting summary dismissal without previous warnings. However, no such action will be taken before a proper investigation and a disciplinary hearing have taken place. Such actions may be in addition to the possibility of criminal prosecution.

5. Procedures

Facilitation Payments

- 5.1 Facilitation payments are small payments made to secure or expedite the performance of a routine action by a government official or agency (e.g., issuing licenses or permits, installation of a telephone line, processing goods through customs, etc.) to which the payer (or the company) has legal or other entitlement.
- 5.2 Facilitation payments are prohibited under the Bribery Act like any other form of bribe. They shall not be given by LHP or LHP's colleagues in the UK or any other country.

Gifts and Hospitality

- 5.3 The LHP's Probity policy includes the restrictions on colleagues relating to the giving or receiving of gifts and hospitality. Colleagues must refer to the Probity policy when offered a gift or hospitality to decide whether to refuse or accept.
- 5.4 Colleagues must declare any gift or hospitality received or provided, including its value, so that it can be recorded in the Register of Gifts and Hospitality, except gifts or hospitality have only a nominal or estimated value of less than £10, provided that these gifts and hospitality do not exceed an annual limit of £50 from one person or organisation to one colleague.

Political and Charitable Contributions

- 5.5 LHP does not make any contributions to politicians, political parties, or election campaigns.
- 5.6 LHP may make charitable donations. However, these payments shall not be provided to any organisation upon suggestion of any person of the public or private sector in order to induce that person to perform improperly the function or activities which he or she is expected to perform in good faith, impartially or in a position of organisation or to reward that person for the improper performance of such function or activities.
- 5.7 Any donations and contributions must be ethical and transparent. The recipient's identity and planned use of the donation must be clear, and the reason and purpose for the donation must be justifiable and documented. All charitable donations will be publicly disclosed.
- 5.8 Donations to individuals and for-profit organisations and donations paid to private accounts are incompatible with LHP's ethical standards and are prohibited.

Sponsoring

- 5.9 Sponsoring means any contribution in money or in kind by LHP towards an event organised by a third party in return for the opportunity raise LHP's profile. All sponsoring contributions must be transparent, pursuant to a written agreement, for legitimate business purposes, and proportionate to the consideration offered by the event host. They may not be made towards events organised by individuals or organisations that have goals incompatible with LHP's ethical standards or that would damage LHP's reputation. All sponsorships will be publicly disclosed.
- 5.10 Where commercial sponsorship is used to fund organisation training events, training materials and general meetings, the sponsorship must be transparent, pursuant to a written agreement, for legitimate business purposes, and proportionate to the occasion. Where meetings are sponsored by external sources, this fact must be disclosed in the papers relating to the meeting and in any published minutes/proceedings.
- 5.11 Where sponsorship links to the development of guidelines and advice, this should be carried out in consultation with the Assistant Director of Governance and Regulation in conjunction with the appropriate organisation working group independent of the sponsors. While it is recognised that consultation with the industry may be necessary when developing a guideline, the overall decision on what is included should lie with the organisation working group.

6. Raising concerns

- 6.1. Before raising a concern, this policy should be read in conjunction with other relevant policies and procedures published by LHP, in particular those listed at the front of this policy. Bribery concerns fall within the definition of Whistleblowing and so the Whistleblowing policy will be followed in investigating these concerns.
- 1.1 Raising a concern about fraud and corruption is often difficult, and colleagues may feel unsure whether to raise a concern and uncertain about how to do it. Support is available internally – colleagues can discuss the issue before raising a concern with their line manager, the Human Resources team, the Chief Executive, another member of the Executive Leadership Team, the Governance Team, their union representative, or the LHP's Whistleblowing Champion (the Chair of the Audit & Risk Committee). Colleagues can also call the LHP's external whistleblowing hotline Safecall or seek external support from the charity Protect (formerly Public Concern at Work).
- 1.2 When colleagues raise a concern, they should provide as much detail as possible. Colleagues may be asked to confirm the details in writing including supporting evidence if this is available. So, it is helpful to start making a record of the concerns as soon as any worries emerge, even if the colleague is unsure at that stage whether they should raise their concerns. When raising a concern colleagues should try to provide the following information:
- the background and reason behind the concern.

- whether you they have already raised a concern with anyone and the response.
 - whether you they have a personal interest in the concern; and
 - any relevant dates.
- 1.3 Colleagues should raise concerns either verbally or in writing at the earliest available opportunity with their line manager. If this is not appropriate, or the concerns are not addressed, colleagues can raise a concern:
- through the confidential reporting form on Basecamp. This area is only accessed and monitored by the Assistant Director of Governance and Regulation (ADGR) and the Governance Manager.
 - by emailing Bribery@lincolnshirehp.com which is sent to the ADGR and the Governance Manager.
 - with the Human Resources team, the Chief Executive, another member of the Executive Leadership Team, the Governance Team, a union representative, or the LHP's Whistleblowing Champion (the Chair of the Audit & Risk Committee); or
 - to the LHP's Whistleblowing hotline: <https://www.safecall.co.uk/>
- 1.4 If the concern relates to suspected wrongdoing by a member Executive Leadership Team, colleagues can raise it directly with the Assistant Director of Governance and Regulation or the LHP's Whistleblowing Champion (the Chair of the Audit & Risk Committee).
- 1.5 If the concern has been raised in line with the Whistleblowing policy, an internal investigation has been concluded, and the worker believes that the appropriate action has not been taken and the concerns have not been addressed, they should report the matter to the Regulator of Social Housing who is the prescribed person under the PIDA for Housing Associations
Tel: 0300 124 5225
enquiries@rsh.gov.uk
www.gov.uk/government/organisations/regulator-of-social-housing
- 7.7 Raising a concern outside the prescribed routes listed in the Whistleblowing policy, for example, with the media, campaign groups, on social media or with political parties, is only protected by PIDA in very limited circumstances and could, if it amounts to an unauthorised disclosure, result in disciplinary action. If employees take matters outside of LHP, they will need to ensure that they do not disclose confidential or legally privileged information. As such, it is advisable that employees take appropriate advice before proceeding.
- 6.2. If an allegation is made in good faith, but it is not confirmed by the investigation, no action will be taken against the originator. If, however, individuals make malicious or vexatious allegations, disciplinary action may be considered against the individual making the allegation.

7. Detecting Bribery

Systems of Internal Control

- 7.1. LHP has procedures in place that reduce the likelihood of bribery occurring. These include Standing Orders, Financial Regulations, documented procedures, a system of internal control (including Internal and External Audit) and a system of risk assessment.
- 7.2. Prevention and detection of bribery is only possible where strong internal controls are present and constantly applied. Routine checks and monitoring by management are therefore essential.
- 7.3. A culture of strong management control will have a deterrent effect when it is known that management are actively involved in ensuring that procedures are followed.

Procurement

- 7.4. Procurement practices will be conducted in a fair and transparent manner and not deal with contractors or suppliers known or suspected to be paying bribes. Before engaging contractors and suppliers, LHP will undertake properly documented due diligence. Unless prospective contractors and suppliers have effective anti-bribery programmes in place, LHP will contractually require them to comply with the Anti- Bribery Policy. Agreements with contractors and suppliers shall, always, provide for the necessary contractual mechanisms to enforce compliance with the anti-bribery arrangements. LHP will monitor performance and, in case of non-compliance, require the correction of deficiencies, apply sanctions, or eventually terminate the agreement.

Recruitment

- 7.5. The recruitment of suitable colleagues is the LHP's first defence in preventing bribery and the adoption of best practice processes must be strictly adhered to. Human Resources will take steps to establish the previous record of potential employees as well as the veracity of required qualifications and memberships of professional bodies, in terms of their propriety and integrity.
- 7.6. All employees where appropriate will be subject to a Disclosure and Barring Service (DBS) check or an enhanced DBS check prior to appointment. DBS checks will be refreshed every three years.

Culture and Awareness

- 7.7. Colleagues are often the first to realise that bribery may be occurring. However, they may not express their concerns because they feel that speaking up would be disloyal to their colleagues or to the LHP. They may also fear harassment or victimisation. In these circumstances, it may be easier to ignore the concern rather than report what may just be a suspicion of malpractice. Therefore, it is important we have a culture within which colleagues feel safe to speak up.

7.8 Colleagues need to be aware of this policy and how to identify bribery. This will be addressed as part of induction, formal training and regular awareness raising. LHP will provide anti-bribery training to all relevant colleagues on a regular basis to make them aware of the Anti-Bribery Policy and guidelines, in particular of possible types of bribery, the risks of engaging in bribery activity, and how suspicion of bribery can be reported.

8 Roles & responsibilities

8.1 **The Board** - has a duty to ensure that there is a secure environment in which to work, and one where colleagues are confident to raise concerns without worrying that it will reflect badly on them. It has a duty to ensure that concerns raised are listened to and addressed and colleagues feel protected when carrying out their official duties and are not placed in a vulnerable position. The Board has a duty to ensure colleagues receive adequate training and support in order to carry out their responsibilities.

8.2 **Colleagues** - All colleagues should be aware of LHP's anti-bribery policy and have a personal responsibility to protect LHP from bribery or corruption. They must comply with the Bribery Act 2010 and with this policy, as well as LHP's Code of Conduct and Probity Policy, which includes guidance on the receipt of gifts or hospitality. They should act with the utmost integrity and take the necessary steps to minimise the risk to LHP and where appropriate report details of detected, suspected, or attempted bribery to the Assistant Director of Governance and Regulation.

8.3 **Professional employees** - must also make themselves aware of and comply with their own professional body codes of conduct e.g., legal, accounting, and other bodies.

8.4 **Managers** – are responsible for ensuring that an adequate system of internal control exists within their areas of responsibility and that controls operate effectively. The primary responsibility for the prevention and detection of bribery therefore primarily rests with managers through the implementation and operation of internal controls and the fostering of an anti-bribery culture but requires the co-operation of all colleagues.

8.5 In implementing this policy, managers must ensure that all employees are treated fairly and within the provisions and spirit of the organisation's Equality and Diversity Policy. Special attention should be paid in ensuring the policy is understood where there may be barriers to understanding caused by the individual's circumstances, where the individual's literacy or use of English is weak, or where the individual has little experience of working life.

8.6 Managers need to:

- Inform colleagues of the requirements of the of LHP's code of conduct, Probity (gifts and hospitality, declaration of interest), Anti- fraud and Corruption and Anti-Bribery policies as part of their induction process,

paying particular attention to the need for accurate completion of personal records and forms.

- Assess the types of risk involved in the operations for which they are responsible and ensure that adequate control measures are put in place to minimise the risks. This must include clear roles and responsibilities, supervisory checks, employee rotation (particularly in key posts), separation of duties wherever possible so that control of a key function is not invested in one individual, and regular reviews, reconciliations, and test checks to ensure that control measures continue to operate effectively.
- Identify sensitive /at-risk posts.
- Ensure that controls are being complied with; and
- Contribute to their Director's assessment of the risks and controls within their business area, which feeds into LHP's overall statements of accountability and internal control.

8.7 All instances of actual or suspected bribery, which come to the attention of a manager, must be reported immediately. It is appreciated that some employees will initially raise concerns with their manager, however, in such cases managers must not attempt to investigate the allegation themselves, and they have the clear responsibility to refer the concerns to the Assistant Director of Governance and Regulation as soon as possible.

8.8 **Assistant Director of Governance and Regulation** - is responsible for implementing the Anti-Bribery Policy – including receiving any allegations of bribery, supporting any investigation, and onwards reporting to the Police, External Audit, the Chair of the Board and Chair of Audit and Risk Committee, as appropriate. They are responsible for providing guidance and training, monitoring compliance and sanctioning violation of the policy. They will review annually the suitability, adequacy and effectiveness of the anti-bribery arrangements and implement improvements as and when appropriate.

8.9 **The Chief Executive** – is responsible for monitoring and ensuring compliance with Secretary of State Directions regarding fraud and corruption.

8.10 **The Executive Director of Strategy, Culture & Digital** – is responsible for decisions relating to whether an employee is to be interviewed or disciplined. They will not conduct a disciplinary investigation, but the employee may be the subject of a separate investigation under the Disciplinary Procedure.

8.11 **Internal and External Audit** - Any incident or suspicion that comes to Internal or External Audit's attention will be passed immediately to the Assistant Director of Governance and Regulation.

8.12 **Human Resources** – is responsible for liaising closely with Managers and the Assistant Director of Governance and Regulation, where an employee is suspected of being involved in bribery or corruption. They are responsible for ensuring the appropriate use of the organisation's Disciplinary Procedure and

shall advise those involved in the investigation in matters of employment law and in other procedural matters, such as disciplinary and complaints procedures.

- 8.13 **The Corporate Head of IT and Digital** – is responsible for reporting any suspicions that IT is being used for bribery purposes to the Assistant Director of Governance and Regulation as soon as possible. This includes inappropriate internet/intranet, e-mail, telephone, and PDA use. Human Resources will be informed if there is a suspicion that an employee is involved.

9. External communications

- 9.1. Individuals (be they employees, agency staff, locums, contractors, or suppliers) must not communicate with any member of the press, media or another third party about a suspected act of bribery as this may seriously damage the investigation and any subsequent actions to be taken. Anyone who wishes to raise such issues should discuss the matter with either the Assistant Director of Governance and Regulation or the Chief Executive.

10. Monitoring and Reporting

- 10.1. Compliance with the Anti-Bribery Policy and these guidelines will be monitored regularly.
- 10.2. Annually the suitability, adequacy and effectiveness of the anti-bribery arrangements will be reviewed, and improvements implemented as and when appropriate. The outcome of this review will be reported to the Audit and Risk Committee.
- 10.3. Incidents of bribery will be reported to the Audit Committee within the quarterly Probity and Compliance report.

11. Additional information

- 11.1. Any abuse or non-compliance with this policy or procedures will be subject to a full investigation and appropriate disciplinary action.
- 11.2. This policy will be subject to annual review.

Appendix 1: Offences Under the Bribery Act 2010

The following business practices constitute criminal offences under the Bribery Act 2010 and are therefore prohibited:

Offences of bribing another person

Case 1 is where an employee offers, promises, or gives a financial or other advantage to another person and intends the advantage (i) to induce that or another person to perform improperly a relevant function or activity, or (ii) to reward that or another person for the improper performance of such a function or activity.

Case 2 is where an employee offers, promises, or gives a financial or other advantage to another person and knows or believes that the acceptance of the advantage would itself constitute the improper performance of a relevant function or activity by that person.

The bribery must relate to (i) a function of a public nature, (ii) an activity connected with a business, (iii) an activity performed in the course of a person's employment, or (iv) an activity performed by or on behalf of a body of persons (whether corporate or un-incorporate). The person performing the function or activity must be expected to perform it in good faith, impartially or in a position of organisation. It does not matter whether the function or activity is performed inside or outside the UK, whether the other person(s) involved is/are in the public or private sector and whether the advantage is offered, promised, or given directly by the employee or through a third party, e.g., an agent or other intermediary.

Offences relating to being bribed

Case 3 is where an employee requests, agrees to receive or accepts a financial or other advantage intending that, in consequence, a relevant function or activity should be performed improperly (whether by him- /herself or another person).

Case 4 is where an employee requests, agrees to receive or accepts a financial or other advantage, and the request, agreement, or acceptance itself constitutes the improper performance by him-/herself of a relevant function or activity.

Case 5 is where an employee requests, agrees to receive or accepts a financial or other advantage as a reward for the improper performance (whether by him-/herself or another person) of a relevant function or activity.

Case 6 is where, in anticipation of or in consequence of an employee requesting, agreeing to receive, or accepting a financial or other advantage, a relevant function or activity is performed improperly (i) by that employee, or (ii) by another person at his/her request or with his/her assent or acquiescence.

Again, the bribery must relate to (i) a function of a public nature, (ii) an activity connected with a business, (iii) an activity performed in the course of a person's employment, or (iv) an activity performed by or on behalf of a body of persons (whether

corporate or incorporate). The person performing the function or activity must be expected to perform it in good faith, impartially or in a position of organisation.

It does not matter whether the function or activity is performed inside or outside the UK, whether the other person(s) involved is/are in the public or private sector, whether the employee requests, agrees to receive or accepts the advantage directly or through a third party, e.g., an agent or other intermediary, and whether the advantage is for the benefit of a employee or another person.

In Cases 4 to 6, it does not matter whether employee knows or believes that the performance of the function or activity is improper.

Bribery of foreign public officials

Case 7 is where an employee bribes a foreign public official and intends (i) to influence that official in his/her capacity as a foreign public official and (ii) to obtain or retain a business or an advantage in the conduct of business. A foreign public official is someone who holds a legislative, administrative, or judicial position of any kind or exercises a public function of a country outside the UK or is an official or agent of a public international organisation.

Failure of corporate organisations (irrespective as to what happens to the profit) to prevent bribery

A corporate or partnership is guilty of a corporate bribery offence if an employee, agent, subsidiary, or any other person acting on its behalf bribes another person intending to obtain or retain business or an advantage in the conduct of business for the corporate or partnership. For a definition of bribery, please refer to Cases 1, 2 and 7 above.

It should be the policy of a corporate or partnership not to tolerate any bribery on its behalf, even if this might result in a loss of business for it.

EQUALITY IMPACT ASSESSMENT

Insert Name of Policy			
Provide a brief summary of the aims and main activities of the initiative (bullet points):			
This Policy sets out LHP's approach to preventing and mitigating the risks of bribery, and where instances occur to have clear investigation plan and processes to deal with it. The Policy provides direction and help to colleagues who may identify suspected bribery.			
Completed By:	Assistant Director of Governance and Regulation	Date:	17 March 2022

Guidelines: Things to consider

- Where a negative (i.e., adverse) impact is identified, it may be appropriate to make a full EIA (see Stage 2), or, as important, take prompt action to redress this – e.g., by abandoning or modifying the initiative. NB If the initiative contravenes equality legislation, it must be abandoned or modified.
- Where an initiative has a positive impact on groups/community relations, the EIA should make this explicit, to enable the outcomes to be monitored over its lifespan.
- Where there is a positive impact on particular groups, does this mean there could be an adverse impact on others, and if so, can this be justified? - e.g. Are there other existing or planned initiatives which redress this?
- It may not be possible to provide detailed answers to some of these questions at the start of the initiative. The EIA may identify a lack of relevant data, and that data-gathering is a specific action required to inform the initiative as it develops, and to form part of a continuing evaluation and review process.

- It is envisaged that it will be rare for full impact assessments to be required. Usually, where there are particular problems identified in the screening stage, it is envisaged that changing the approach at this stage, and/or setting up a monitoring/evaluation system to review a policy's impact over time will tackle the problem.

STAGE 1: SCREENING

This stage establishes whether a proposed initiative will have an impact from an equality perspective on any particular group of people or community – i.e., on the grounds of race, religion/faith/belief, gender (including transgender), sexual orientation, age, disability, or whether it is “equality neutral” (i.e., have no effect either positive or negative).

Q 1. Who will benefit from this initiative? Is there likely to be a positive impact on specific groups/communities (whether or not they are the intended beneficiaries), and if so, how? Or is it clear at this stage that it will be equality 'neutral' i.e., will have no particular effect on any group? *Please consider all aspects of Diversity including as a minimum: Age, Disability, Gender/Transgender, Race/Ethnicity, Religion/Faith/Belief, Sexuality*

It is expected that this policy will be equality neutral – as applies equally to all employees, Board and Committee Members.

Q 2. Is there likely to be an adverse impact on one or more minority/under-represented or community group as a result of this initiative? If so, who may be affected and why: Or is it clear at this stage that it will be equality 'neutral'? *Please consider all aspects of Diversity including as a minimum: Age, Disability, Gender/Transgender, Race/Ethnicity, Religion/Faith/Belief, Sexuality*

It is expected that this policy will be equality neutral.

Q 3. Is there sufficient data on the target beneficiary groups/communities? Are any of these groups under or overrepresented? Do they have access to the same resources? What are your sources of data and are there any gaps? *Please consider all aspects of Diversity including as a minimum: Age, Disability, Gender/Transgender, Race/Ethnicity, Religion/Faith/Belief, Sexuality*

LHP collects diversity data on its employees, Board and Committee members and compares the diversity profile to the profile of the communities within which LHP serves (ONS data).

Q 4. Outsourced services – if the initiative is partly or wholly provided by external organisations / agencies, please list any arrangements you plan to ensure that they promote equality and diversity. *Please consider all aspects of Diversity including as a minimum: Age, Disability, Gender/Transgender, Race/Ethnicity, Religion/Faith/Belief, Sexuality*

NA

Q 5. Is the impact of the initiative (whether positive or negative) significant enough to warrant a full impact assessment – see guidance? If not, will there be monitoring and review to assess the level of impact over a period of time? *Please consider all aspects of Diversity including as a minimum: Age, Disability, Gender/Transgender, Race/Ethnicity, Religion/Faith/Belief, Sexuality*

No

Q 6. To be completed at six monthly review Detail actions taken to assess the level of impact over a period of time, or to address any gaps in data. *Please consider all aspect of Diversity including as a minimum: Age, Disability, Gender/Transgender, Race/Ethnicity, Religion/Faith/Belief, Sexuality*