

<b>SUBJECT:</b>	<b>ANTI-BRIBERY POLICY UPDATE</b>
<b>REPORT BY:</b>	<b>JOHN SCOTT, AUDIT MANAGER</b>
<b>LEAD OFFICER:</b>	<b>JOHN SCOTT, AUDIT MANAGER</b>

## 1. Purpose of Report

- 1.1 To review and approve an updated anti-bribery policy.

## 2. Details

- 2.1 The anti-bribery policy is updated and reviewed every two years, or on any significant change to the law.

The Bribery Act 2010 makes it an offence to offer, promise or give a bribe. It also makes it an offence to request, agree to receive, or accept a bribe. The Policy sets out the Council's policy on anti-bribery in accordance with the legislation and guidance.

## 3. Key Changes

- 3.1 Wording changes to note are:

- a) Ensure information is provided to enable the general public to report suspected cases of bribery, fraud and corruption.
- b) Ensure officers and members adhere to legal and contractual requirements, procedures and practices including the Council's codes of conduct, contract and financial procedure rules and procurement guidelines.
- c) The offering and acceptance of gifts, donations, sponsorship and corporate hospitality should be strictly in accordance with the Council's codes and procedures. Conflicts of Interests should be managed in accordance with the Council's codes and procedures.
- d) The procedure for investigation follows the fraud response plan set out in the Counter Fraud strategy.
- e) A section on "sanctions" was also included.

## 4. Organisational Impacts

- 4.1 Finance

There are no direct financial implications arising as a result of this report.

- 4.2 Legal Implications including Procurement Rules

There are no direct legal implications.

#### 4.3 Equality, Diversity & Human Rights

There are no direct E and D implications arising as a result of this report.

### 5. Recommendation

5.1 Audit Committee should comment on and approve the revised anti-bribery policy.

**Key Decision** No

**Do the Exempt Information Categories Apply?** No

**Call in and Urgency:** Is the decision one to which Rule 15 of the Scrutiny Procedure Rules apply? No

**How many appendices does the report contain?** One

**List of Background Papers:** None

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