



Stapleford Abbots Parish Council

ANTI-BRIBERY POLICY

Version: 1.3

June 2023

A Scope

This policy applies to the Stapleford Abbots Parish Council. Where the term ‘staff’ is used, this includes any staff (paid and voluntary) working for the Council. This policy is aimed at all Councillors and staff working for Stapleford Abbots Parish Council.

B Confidential Notice & Intellectual Property

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C Document Details

Policy	<i>Anti-Bribery Policy</i>
Policy Statement	<i>This document sets out an Anti-Bribery Policy to use by Stapleford Abbots PC</i>
Version Number	<i>1.3</i>
Version Date	<i>01/06/2023</i>
Review Date	<i>01/04/2024</i>
Author	<i>SAPC</i>
Responsible Owner	<i>Stapleford Abbots Parish Council</i>
Approving Body	<i>Stapleford Abbots Parish Council</i>

D **Revision History**

Version	Revision Date	Details of Changes	Author
1.1	01/06/2021	First version	J Jackson
1.2	01/06/2022	Second version	J Jackson
1.3	01/06/2023	Current version	J Jackson

E **Freedom of Information**

If requested, this document may be made available to the public and persons outside the Council as part of Stapleford Abbotts Parish Council’s commitment to transparency and compliance with the Freedom of Information Act.

F **Accessibility**

This document can be made available in other styles, formats, sizes, languages and media in order to enable anyone who is interested in its content to have the opportunity to read and understand it. Any such requests should be made to the Clerk.

G **Dissemination**

This policy will be disseminated to all staff. All staff will have to read this policy at publication and every time there is an update or change to the policy. The Stapleford Abbotts Parish Councillors will have the overall responsibility for implementing the policy.

H **Review**

This policy will be reviewed every year or when new evidence, policy or guidelines come to light necessitating an update / change. The policy review and update will be the responsibility of the Stapleford Abbotts Parish Council.

1. Purpose

The purpose of this policy is to establish controls to ensure compliance with all applicable anti-bribery regulations, and to ensure our business is conducted in a socially responsible manner. This policy applies to the area that we as an organisation operates in Stapleford Abbots Parish.

2. Policy statement

Bribery is the offering, promising, giving, accepting or soliciting of an advantage as an inducement for action which is illegal or a breach of trust. A bribe is an inducement or reward offered, promised or provided in order to gain any commercial, contractual, regulatory or personal advantage.

It is our policy to conduct all of our business in an honest and ethical manner. We take a zero-tolerance approach to bribery and corruption. We are committed to acting professionally, fairly and with integrity in all our business dealings and relationships wherever we operate, implementing, and enforcing effective systems to counter bribery.

We will uphold all laws relevant to countering bribery and corruption in all the jurisdictions in which we operate. However, we remain bound by the laws of the UK, including the Bribery Act 2010, in respect of our conduct both at home and abroad.

Bribery and corruption are punishable for individuals by up to ten years' imprisonment and a fine. If we are found to have taken part in corruption, we could face an unlimited fine, be excluded from tendering for public contracts and face damage to our reputation. We therefore take our legal responsibilities very seriously.

3. Scope

3.1 Who is covered by the policy?

In this policy, **third party** means any individual or organisation you meet in the course of your work for us, and includes actual and potential clients, customers, suppliers, distributors, business contacts, agents, advisers, and government and public bodies, including their advisors, representatives and officials, politicians and political parties. All arrangements with third parties should be subject to clear contractual terms, including specific provisions requiring them to comply with minimum standards and procedures in relation to bribery and corruption. Appropriate wording to be included in contracts can be obtained from the EALC.

This policy applies to all employees (whether permanent, fixed-term or temporary), consultants, contractors, trainees, seconded staff, home workers, volunteers, agents, sponsors, or any other person associated with us, or any of our subsidiaries or their employees, wherever located (collectively referred to as **employees or Parish Councillors** in this policy).

This policy covers:

- Bribes;
- Gifts and hospitality;
- Facilitation payments
- Political contributions;
- Charitable contributions

3.2 **Bribes**

Parish Councillors or Employees must not engage in any form of bribery, either directly or through any third party (such as an agent or distributor). Specifically, employees must not bribe a foreign public official anywhere in the world.

3.3 **Gifts and hospitality**

Please see our Gifts Policy.

3.4 **Facilitation payments and kickbacks**

Facilitation payments are a form of bribery made for the purpose of expediting or facilitating the performance of a public official for a routine governmental action, and not to obtain or retain business or any improper business advantage. Facilitation payments tend to be demanded by low level officials to obtain a level of service, which one would normally be entitled to.

Our strict policy is that facilitation payments must not be paid. We recognise, however, that our employees may be faced with situations where there is a risk to the personal security of an employee or his/her family and where a facilitation payment is unavoidable, in which case the following steps must be taken:

- Keep any amount to the minimum;
- Create a record concerning the payment; and
- Report it to the Chair.

3.5 **Political contributions**

We do not make donations, whether in cash or kind, in support of any political parties or candidates, as this can be perceived as an attempt to gain an improper business advantage.

3.6 **Charitable contributions**

Charitable support and donations are acceptable (and indeed are encouraged), whether of in-kind services, knowledge, time, or direct financial contributions. However, employees must be careful to ensure that charitable contributions are not used as a scheme to conceal bribery. We only make charitable donations that are legal and ethical under local laws and practices]. No donation on behalf of the organisation must be offered or made without prior approval of a member of the Parish Council.

4. **Record-keeping**

You must declare and keep a written record of all gifts accepted or offered, which will be subject to review.

You must ensure all expenses claims relating to hospitality, gifts or expenses incurred to third parties are submitted in accordance with our expenses policy.

5. How to raise a concern

You are encouraged to raise concerns about any issue or suspicion of malpractice at the earliest possible stage. If you are unsure whether a particular act constitutes bribery or corruption, or if you have any other queries or concerns, these should be raised with the Chair.

6. What to do if you are a victim of bribery or corruption

It is important that you report this to your clerk or Chair of the Parish Council as soon as possible if you are offered a bribe by a third party, are asked to make one, suspect that this may happen in the future, or believe that you are a victim of another form of unlawful activity.

7. Protection

Councillors or its employees who refuse to accept or offer a bribe, or those who raise concerns or report another's wrongdoing, are sometimes worried about possible repercussions. We aim to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken.