

- 1.1 This policy is introduced to ensure compliance with the Bribery Act 2010. The Bribery Act became law on 1 July 2011. It explains the process through which the Council intends to maintain high standards and to protect the organisation, its Members, employees at all levels and grades, temporary and agency staff, volunteers, contractors, agents, consultants and persons or partners acting on the Council's behalf, (hereafter referred to as 'staff') against allegations of bribery and corruption.
- 1.2 Before 1 July 2011, organisations were only likely to be guilty of a bribery offence if senior management were involved. The Bribery Act applies to all staff in the organisation including councillors and how an organisation may be guilty of bribery if only the individual offender knew of the bribery taking place.
- 1.3 Organisations will have a defence against prosecution if they can demonstrate that they had "adequate procedures in place to prevent bribery".
- 1.4 The Council is committed to the highest possible standards of openness probity and accountability and to conducting its business in an honest and open way, and without the use of corrupt practices or acts of bribery to obtain an unfair advantage. The Council attaches the utmost importance to this policy and will apply a "zero tolerance" approach to acts of bribery and corruption by any of its staff acting on its behalf. Any breach of this policy will be regarded as a serious matter and be likely to result in disciplinary action and possibly criminal prosecution.
- 2.1 Bribery and the use of a third party to channel bribes is a criminal offence. The Council does not, and will not, pay bribes, or offer improper inducements to anyone for any purpose, nor will the Council accept bribes or improper inducements. The use of a third party to channel bribes is also a criminal offence. The Council does not and will not engage indirectly in or otherwise to encourage bribery.
- 2.2 The Council is committed to ensuring compliance with the highest legal and ethical standards. The Council through its managers and staff

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12.1 Staff are encouraged to raise any concerns with their manager and make use of the Council's Whistleblowing Procedure. This provides information on the courses of action available to report serious concerns (including bribery) in confidence. The Council is aware that staff who refuse to accept the offer of a bribe and who wish to report the incident may worry about the repercussions for themselves and their employment. Therefore, the Council in encouraging openness will support anyone who raises a genuine concern under this policy, even if the alleged act of

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