

AUDIT COMMITTEE	AGENDA ITEM. 6
3 FEBRUARY 2014	PUBLIC REPORT

Cabinet Member responsible:	Councillor Seaton, Resources Portfolio Holder	
Contact Officer(s):	Kim Sawyer, Director of Governance	452361

ANTI BRIBERY POLICY

RECOMMENDATIONS
FROM : Kim Sawyer, Director of Governance
Audit Committee is recommended to
<ol style="list-style-type: none"> 1. Review the attached Anti-Bribery Policy for implementation; and 2. Recommend the Policy for approval by The Cabinet Member for Resources.

1. ORIGIN OF REPORT

This report is submitted to the Committee as part of the work to ensure best practice is established within the Council's anti-fraud and corruption strategies.

2. PURPOSE AND REASON FOR REPORT

- 2.1 The main purpose of this report is to seek the Committee's comments on the Anti-Bribery Policy and to ask the Committee to recommend the policy for adoption by the Cabinet Member for Resources.
- 2.2 This report is to be considered in accordance with its Terms of Reference 2.2.1.14 - *To monitor council policies on "raising concern at work" and the anti-fraud and anti-corruption strategy and the Council's complaints process.*

3. ANTI-BRIBERY POLICY

- 3.1 The United Kingdom public sector maintains high standards of probity and has a good reputation for protecting the public purse. Sound systems of public accountability are vital to effective management and in maintaining public confidence. Peterborough City Council shares these high standards and is committed to protecting the public funds entrusted to it. The minimisation of losses to fraud and corruption is essential for ensuring that resources are used for their intended purpose - that of providing services to the citizens of Peterborough.
- 3.2 The public is entitled to expect the Council to conduct its affairs with integrity, honesty and openness and to demand the highest standards of conduct from those working for it. The Council is committed to preventing bribery and ensuring that a culture exists within the authority in which bribery is never acceptable.
- 3.3 The Bribery Act 2010 introduced a corporate offence of failing to prevent bribery particularly where the organisation failed to have in place adequate procedures to prevent bribery.

- 3.3 The attached policy (**Appendix A**) demonstrates this commitment to high standards of conduct and defines the key terms and responsibilities.
- 3.4 The procedures contained within the policy set out how individuals can report concerns and how the Council will respond. This policy recognises the synergy between whistleblowing and anti-bribery measures. It provides a coherent and consistent framework to enable Peterborough City Council members, officers, our partners and the wider audience to understand and implement arrangements to enable compliance.

4. CONSULTATION

Consultation has taken place between the following parties:

- Director of Governance
- Executive Director of Strategic Resources (as the designated s.151 officer); and
- Chief Internal Auditor

5. ANTICIPATED OUTCOMES

That the Council will have in place a policy which will assist in meeting its responsibilities under the Bribery Act 2010.

6. REASONS FOR RECOMMENDATIONS

The Council should have policy and procedures in place to prevent bribery and corruption either by individuals seeking to make a gain or those accepting such inducements. The Council is a commercial organisation as defined by the Bribery Act and could be liable to prosecution should we fail to have adequate safeguards in place to prevent bribery.

7. IMPLICATIONS

The Council will become more aware and will continue to consider the risks and consequences of this type of abuse. This policy along with other policies such as the Fraud and Corruption Policy will continue to highlight that fraud and corruption are unacceptable. The presumption must be about preventing corruption by designing systems to stop it happening in the first place but where it occurs, there should be an equal presumption that its perpetrators will face tough action. This can only serve to increase the standards of conduct in the Council.

8. BACKGROUND DOCUMENTS

Used to prepare this report, in accordance with the Local Government (Access to Information) Act 1985)

Bribery Act 2010

9. APPENDICES

Appendix A - Bribery Policy – To follow