

OFFICIAL

Anti-Bribery and Corruption Policy

1. Policy Statement

- 1.1 The Bribery Act 2010 made bribery a criminal offence. The Council is committed to maintaining the highest standards of integrity, honesty, transparency, accountability and ethical conduct in all of its activities. **The Council adopts a zero-tolerance approach to bribery, corruption, fraud and other forms of economic crime.**
- 1.2 The Council and everyone employed by us, including members, temporary and agency staff, consultants, contractors and volunteers will not offer, promise, give, request or accept bribes, inducements, kickbacks facilitation payments and other improper inducements or benefits, either directly or indirectly through third parties.
- 1.3 The Council is committed to preventing, detecting, deterring and responding to bribery, corruption, fraud and any other forms of economic crime. Action will be taken against any individual or organisation found to have engaged in such activities.
- 1.4 All employees, Members, agency workers, contractors, consultants, volunteers and those acting on behalf of the Council have a responsibility to uphold this policy and report any concerns regarding suspected bribery, corruption or unethical conduct.

2. What is bribery and Corruption?

- 2.1 Bribery is the offering, promising, giving, requesting or accepting of a financial or other advantages, designed with the intention of influencing an individual to take an improper decision or action to secure an improper advantage. These inducements can take many forms including offering cash, gifts, hospitality, loans, discounts, holidays, event tickets or preferential treatment. Decisions could relate to recruitment, the award of contracts, planning consents, licensing, grants and other awards.
- 2.2 There are four key offences under the Bribery Act 2010:
 - bribing another person (section 1);
 - accepting a bribe (section 2);
 - bribing a foreign public official (section 6); and
 - failing to prevent bribery (section 7).

OFFICIAL

- 2.3 Individuals convicted of an offence under the Bribery Act 2010 may face imprisonment of up to ten years, unlimited fines and reputational damage. The Council may also take disciplinary, civil or contractual action where appropriate.
- 2.4 Corruption is the abuse of entrusted power, position or authority for personal benefit or to confer an improper advantage on another person or organisation. Many local authority investigations involve corruption rather than straightforward bribery.
- 2.5 Corruption can include undeclared conflicts of interest, manipulation of procurement exercises, favouritism in recruitment, improper award of grants, abuse of position, misuse of confidential information and unauthorised contract variations.

3. Scope of the policy

- 3.1 This policy provides a coherent and consistent framework to enable all our employees to understand and implement arrangements to enable compliance with the Bribery Act 2010. Compliance with this policy forms part of the Council's wider Anti-Fraud, Bribery and Corruption Framework, enabling individuals to identify and effectively report a potential breach.
- 3.2 This policy applies to all Council activities and operations and to all staff including all permanent, temporary and agency staff, contractors, agents, members (including independent members), volunteers and consultants, acting on behalf of the Council. The Council expects suppliers, delivery partners, commissioned providers, contractors and organisations receiving Council funding to maintain standards consistent with this policy.

4. Our commitment to Preventing Bribery and Corruption

- 4.1 In order to comply with the Bribery Act 2010, the Council will:
 - Maintain and regularly review this policy.
 - Promote a culture of honesty and integrity.
 - Undertake fraud and corruption risk assessments.
 - Maintain effective internal controls.
 - Provide training and awareness programmes.
 - Operate gifts and hospitality arrangements.
 - Maintain conflict of interest declarations.

OFFICIAL

- Encourage reporting of concerns.
 - Investigate allegations promptly and professionally.
 - Work with law enforcement and regulatory agencies where appropriate; and
 - **Take a robust line against anyone found to have breached this policy or to have committed or facilitated bribery.**
- 4.2 As regards training and awareness programmes, we will be cognisant of the Ministry of Justice guidance on the Bribery Act 2010 emphasising six principles:
- proportionality
 - top-level commitment
 - risk assessment
 - due diligence
 - communication/training
 - monitoring and review.
- 4.3 The Council recognises that increased bribery and corruption risks may arise in relation to:
- Procurement and commissioning.
 - Major works and capital programmes.
 - Contract management.
 - Adult social care commissioning.
 - Planning and licensing.
 - Housing allocation and temporary accommodation.
 - Recruitment and appointments.
 - Grant administration.
 - Sponsorship arrangements.
 - Partnerships and joint ventures.
- 4.4 It is unacceptable for any person covered by this policy to:
- Offer or provide a bribe.
 - Request or accept a bribe.
 - Facilitate or conceal corrupt activity.
 - Abuse their position for personal gain.
 - Fail to declare a conflict of interest.
 - Attempt to influence procurement or recruitment decisions improperly.
 - Provide confidential information to obtain an advantage.
 - Retaliate against anyone reporting concerns.
 - Engage in any conduct that breaches this policy.

OFFICIAL

5. Contracts and Third-Party Relationships

- 5.1 Appropriate due diligence may be undertaken on suppliers, contractors, consultants, commissioned providers and delivery partners where bribery or corruption risks have been identified.
- 5.2 Any attempt to improperly influence procurement, commissioning or contract management decisions must be reported immediately.
- 5.3 Under the Procurement Act 2023, a company is automatically barred from competing for public contracts where it is convicted of a corruption offence. Companies that are convicted of failing to prevent bribery and corruption are not automatically barred from participating in tenders for public contracts. We have the discretion to exclude organisations convicted of this offence and you should get advice from our Procurement team on this issue.

6. Raising a concern

- 6.1 We want everyone who has any concerns to be able to report these effectively. Our Whistleblowing policy sets out how to do this, including making an anonymous referral through our Fraudcall@haringey.gov.uk email.

7. Monitoring

- 7.1 The Council's Monitoring Officer is responsible for the maintenance and operation of this policy. The Monitoring Officer and Head of Audit and Risk Management will liaise with the Assistant Director of Human Resources when the policy is subject to review in order to ensure all relevant employment requirements are taken into account.
- 7.2 The Council will proactively monitor bribery and corruption risks through:
 - Internal Audit reviews.
 - Data analytics.
 - Contract monitoring.
 - Management assurance processes.
 - National Fraud Initiative data matching exercises.
 - Review of gifts and hospitality declarations.
 - Conflict of interest registers.



OFFICIAL

- 7.3 Information obtained through monitoring activities may be used to identify potential indicators of fraud, bribery or corruption and to strengthen controls.