

ANTI-BRIBERY POLICY AND PROCEDURE

SUMMARY

- 1.1 This report provides members with an update on proposed revisions to the Council's Anti-Bribery Policy and Procedure.

RECOMMENDATIONS

- 2.1 To approve the revisions to the Council's Anti-Bribery Policy and Procedure.

REASON FOR RECOMMENDATIONS

- 3.1 The Audit and Accounts Committee is responsible for providing assurance to the Council on the effectiveness of the governance arrangements, risk management framework and internal control environment.

SUPPORTING INFORMATION

- 4.1 The Council's Anti-Bribery Policy was approved by this Committee at its meeting on 1 December 2011. As part of its controls work within the 2011/12 interim audit, Grant Thornton's Forensic and Investigations Service reviewed the content of the policy. A number of improvements were suggested in the action plan attached to the interim audit report.

4.2 Management agreed to make the following improvements to the policy:

- that the Policy details the potential penalties (e.g. potential prison sentence and/or unlimited fines) as it will focus a readers' attention, given the significance of these penalties.
- that the Council considers further the role of 'associated persons' and incorporates this into the Policy.
- that the Council supplements this paragraph with detail of the risk assessment process performed and whether there were any gaps in control identified, and if so, how these gaps are to be addressed.
- that the Council documents the communication and training actually provided to demonstrate that it has adequately trained staff based on its risk assessment.

4.3 The policy has now been amended to reflect the improvements in 4.2 above (see Appendix 2). A guidance document has also been produced to accompany the policy (see Appendix 3).

OTHER OPTIONS CONSIDERED

5.1 None.

This report has been approved by the following officers:

Legal officer Financial officer Human Resources officer Service Director(s) Other(s)	
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For more information contact: Background papers: List of appendices:	Richard Boneham Head of Governance and Assurance, 01332 643280 richard.boneham@derby.gov.uk None Appendix 1 – Implications Appendix 2 – Policy Appendix 3 - Guidance
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IMPLICATIONS

Financial and Value for Money

- 1.1 None directly arising.

Legal

- 2.1 None directly arising.

Personnel

- 3.1 None directly arising.

Equalities Impact

- 4.1 None directly arising.

Health and Safety

- 5.1 None directly arising.

Environmental Sustainability

- 6.1 None directly arising.

Asset Management

- 7.1 None directly arising.

Risk Management

- 8.1 Sound risk management practices are a key principle of good governance.

Corporate objectives and priorities for change

- 9.1 The governance framework includes arrangements to plan and monitor delivery of the Council's priorities.