

Crawley Borough Council

**Report to Cabinet
23 November 2022**

Anti-Bribery Policy

Report of the Head of Corporate Finance – **FIN/597**

1. Purpose

- 1.1 To request approval for the adoption of the revised Anti-Bribery Policy in Appendix A

2. Recommendations

- 2.1 To the Cabinet

The Cabinet is recommended to:

- a) Approve the Anti-Bribery Policy (Appendix A) for adoption and subsequent publication.
- b) Delegate authority to the Head of Corporate Finance, in consultation with the Leader, to review and make minor amendments to the Anti-Bribery Policy as further changes to legislation and statutory guidance are introduced. (*Generic Delegation 7 will be used to enact this recommendation*).

3. Reasons for the Recommendations

- 3.1 To fulfil the Council's duty to review and publish guidance relating to the Anti-Bribery Policy.

4. Background

- 4.1 The Council takes its responsibilities to protect the public purse very seriously and is committed to the highest standards of openness and accountability in order to ensure the proper use and protection of public funds and assets.

5. Description of Issue to be resolved

- 5.1 The last policy was The Anti-Fraud and Corruption (Including Bribery) and Whistleblowing Policies approved by the Audit and Governance Committee on 13 December 2011 ([FIN/255](#)).
- 5.2 A review was carried out in 2022 and our colleagues in the Southern Internal Partnership have recommended we produce a stand-alone Anti-Bribery Policy.
- 5.3 The draft Anti-Bribery Policy has been prepared following the 2022 review and it is proposed that this new policy will be adopted.

6. Information & Analysis Supporting Recommendation

- 6.1 This policy presents a clear and precise framework to understand and implement the arrangements required to comply with the Bribery Act 2010. It provides the context for the detailed rules, procedures and controls in place within the Council. It is intended to provide no room for misinterpretation and to ensure that staff know what is expected of them in preventing bribery.
- 6.2 The content of this policy is standard and compliant with legislation. It is similar to equivalent documents at other local authorities.

7. Implications

- 7.1 Staffing – There are no direct staffing implications associated with implementing the Anti-Bribery Policy
- 7.2 Financial – There are no financial implications associated with implementing the Anti-Bribery Policy.
- 7.3 Legal - There are no legal implications associated with implementing the Anti-Bribery Policy.
- 7.4 Equalities Impact Assessment. There are no impacts of note with implementing the Anti-Bribery Policy.

8. Background Papers

Fraud Act 2006
Bribery Act 2010
Local Government Finance Act 1992
Officer code of conduct
Member's code of conduct
Whistleblowing Policy
Financial Procedure Rules
Procurement Code
Proceeds of Crime Act
Social Security Administration (Fraud) Act 1997
The Council Tax Reduction Schemes (Detection and Enforcement) 2013

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