

## ITEM NO: 4

<b>REPORT TO:</b>	<b>STANDARDS COMMITTEE</b>
<b>DATE:</b>	4 October 2011
<b>REPORT OF:</b>	Wendy Poole – Head of Risk Management and Audit Services
<b>SUBJECT MATTER:</b>	<b>THE BRIBERY ACT 2010</b>
<b>REPORT SUMMARY:</b>	The Bribery Act 2010, which overhauls the country's outdated anti-corruption laws, came into force on the 1 July 2011. This report sets out the Council's updated strategy to implement the act including communicating with Members, employees and partners/contractors.
<b>RECOMMENDATION(S):</b>	The report and action plan is noted and approved for adoption.
<b>FINANCIAL IMPLICATIONS:</b> (Authorised by Borough Treasurer)	There are no significant financial issues arising from this Report.
<b>LEGAL IMPLICATIONS:</b> (Authorised by Borough Solicitor)	Compliance with the Bribery Act 2010 and the guidance issued by the Secretary of State (Ministry of Justice) under Section 9 of the Act relating to the procedures to be put in place to prevent persons within an organisation from bribing.
<b>RISK MANAGEMENT:</b>	In addition to individuals being prosecuted for bribery offences, organisations failing to introduce proper procedures to prevent bribery can be fined under the Act.
<b>LINKS TO COMMUNITY PLAN:</b>	Support the current arrangements for ethical and corporate governance of the authority to ensure that the public can have confidence in local government.
<b>ACCESS TO INFORMATION:</b>	<b>NON-CONFIDENTIAL</b> <b>This report does not contain information, which warrants its consideration in the absence of the Press or members of the public.</b>
<b>REFERENCE DOCUMENTS:</b>	The background papers relating to this report can be inspected by contacting the report author, Wendy Poole, the Council's Head of Risk Management and Audit Services by: Telephone: 0161 342 3846 e-mail: <a href="mailto:wendy.poole@tameside.gov.uk">wendy.poole@tameside.gov.uk</a>

## 1. INTRODUCTION

1.1 The Bribery Act 2010 received Royal Assent on the 9 April 2010 and came into force on the 1 July 2011. The Act introduces four offences:-

- Bribing another person;
- Being bribed;
- Bribery of foreign public officials; and
- Failure of commercial organisations to prevent bribery.

1.2 The Bribery Act creates a new offence under section 7 which can be committed by commercial organisations which fail to prevent persons associated with them from committing bribery on their behalf. It is a defence for an organisation to prove that despite a particular case of bribery it nevertheless had adequate procedures in place to prevent persons associated with it from bribing. Section 9 of the Act requires the Secretary of State to publish guidance about procedures which commercial organisations can put in place to prevent persons associated with them from bribing.

1.3 This guidance is designed to help commercial organisations of all sizes and sectors understand what sorts of procedures they can put in place to prevent bribery from occurring within them. It is designed to be of general application. The guidance sets out six principles, each followed by commentary and explanation. The guidance is not prescriptive and is not a one-size-fits-all document. The question of whether an organisation had adequate procedures in place to prevent bribery in the context of a particular prosecution is a matter that can only be resolved by the courts taking into account the particular facts and circumstances of the case. The onus will remain on the organisation, in any case where it seeks to rely on the defence, to prove that it had adequate procedures in place to prevent bribery. However, by considering the general principles set out in the document, and establishing and maintaining policies and procedures in line with those principles, commercial organisations will do much to help prevent bribery from taking place on their behalf.

1.4 Whilst the public sector is not a commercial organisation and technically not covered by the Act, professional bodies like CIPFA (Chartered Institute of Public Finance and Accountancy) are advocating that the Act is applicable to the public sector and therefore we should be making sure that our preventative measures are in place and demonstrable.

1.5 At the meeting of the Standards Committee on the 7 December 2010 the Council's Strategy to implement appropriate measures to prevent bribery occurring within the organisation was presented, based on the draft guidance issued by the Secretary of State. This was supplemented with an Action Plan outlining the proposed action to be undertaken. Since this meeting the Secretary of State has issued further updated guidance in relation to the implementation of this act and the Council's Strategy and Action Plan have been appropriately updated to take account of this new guidance

1.6 The updated guidance still refers to six principles however, these have been amended and updated and are outlined below:-

- Proportionate Procedures;
- Top Level Commitment;
- Risk Assessment;
- Due Diligence;
- Communication (including training); and
- Monitoring and Review.

- 1.7 The following sections of the report will outline briefly what the updated guidance requires and then identify the strategy to be adopted by the Council. An Action Plan to deliver the requirements is attached at **Appendix 1**, with the current status of each of the actions.
- 1.8 Consultation on a Draft British Standard (BS 10500 Specification for an anti-bribery management system ABMS) has just closed. The details of the Standard are in line with the Guidance issued by the Ministry of Justice. The Standard is applicable to small, medium and large organisations in the public, private and voluntary sectors. The bribery risk facing an organisation varies according to factors such as the size of the organisation, the countries and sectors in which the organisation operates, and the nature, scale and complexity of the organisation's operations. Therefore, the Standard specifies the implementation by the organisation of policies, procedures and controls which are reasonable and proportionate having regard to the nature and extent of bribery risks faced by the organisation. From the work already undertaken we are confident that all aspects have been covered, however, once finalised we will revisit our system in light of the British Standard.
- 1.9 Work is required to ensure that the organisation is appropriately protected against bribery and the approval and implementation of the attached document is the starting point to the process. From this we have to ensure that the zero tolerance culture and anti-bribery policies and procedures are appropriately embedded, monitored, regularly reviewed and updated.
- 1.10 Although work is still required, it is important to remember that Tameside is a local authority recognised for already having excellent governance arrangements in place. Operating in an environment where protecting the public purse is of paramount importance we already operate from a strong stance where honesty, integrity, openness and transparency are key attributes. Therefore, many of the requirements identified in the guidance are not new and to adhere to the principles will require the Council to review and update existing policies and procedures in light of the Bribery Act.

## 2. PRINCIPLE 1 – PROPORTIONATE PROCEDURES

*"A commercial organisation's procedures to prevent bribery by persons associated with it are proportionate to the bribery risks it faces and to the nature, scale and complexity of the commercial organisations activities. They are also clear, practical, accessible, effectively implemented and enforced."*

- 2.1 The term 'procedures' is used to embrace both bribery prevention policies and the procedures which implement them. Policies articulate a commercial organisations bribery stance, show how it will be maintained and help to create an anti bribery culture. They are therefore a necessary measure in the prevention of bribery as long as they achieve the objectives and are properly implemented.
- 2.2 The procedures need to be proportionate to the bribery risk that the organisation faces.
- 2.3 The procedures should seek to ensure there is a practical and realistic means of achieving the organisations stated anti-bribery objectives across all of the organisations functions.
- 2.4 To meet the requirements of this principle the Council will review:-
- Gifts and Hospitality Policy;
  - Whistle Blowing Policy;
  - Fraud Response Plan;
  - Money Laundering Procedures;

- Recruitment and Selection Policy;
- Disciplinary Procedures
- Induction Process
- Standard Contract Documentation;
- Partnership Agreements; and
- Code of Conduct for Employees.

**Please Note:** - The above documents have been included under proportionate procedures but may also relate to other principles.

### 3. PRINCIPLE 2 – TOP LEVEL COMMITMENT

*“The top level management of a commercial organisation are committed to preventing bribery by persons associated with it. They foster a culture within the organisation in which bribery is never acceptable.”*

- 3.1 Those at the top of the organisation are in the best position to foster a culture of integrity where bribery is unacceptable. The purpose of this principle is to encourage the involvement of top level management in the determination of bribery prevention procedures. It is also to encourage top level involvement in any key decision making relating to bribery risk where that is appropriate for the organisation’s management structure.
- 3.2 A statement of commitment to counter bribery in all parts of the council’s operation is essential. The statement should include commitments to carry out business fairly, honestly and openly, to adopt a zero tolerance policy towards bribery and set out the consequences of breaching the provisions. The statement should be made public and cover contractors and partners.
- 3.3 To meet the requirement of this principle the Council will:-
- Review the Anti Fraud and Corruption - Statement of Intent, clearly referring to the new Bribery Act 2010 and the potential offences.

### 4. PRINCIPLE 3 – RISK ASSESSMENT

*“The commercial organisation assesses the nature and extent of its exposure to potential external and internal risks of bribery on its behalf by persons associated with it. The assessment is periodic, informed and documented.”*

- 4.1 The purpose of this principle is to promote the adoption of risk assessment procedures that are proportionate to the organisations size and structure and to the nature, scale and location of its activities.
- 4.2 The more understanding an organisation is of the bribery risks its faces the more effective its efforts to prevent bribery are likely to be.
- 4.3 Risk assessments should have a number of basis characteristics. These are:-
- Oversight of the risk assessment by top level management;
  - Appropriate resourcing;
  - Identification of the internal and external information sources that will enable risk to be assessed and reviewed;
  - Due diligence enquires; and

- Accurate and appropriate documentation of the risk assessment and its conclusions.

4.4 Commonly encountered external risks can be categorised into five broad groups:-

- Country risks** – this is evidenced by perceived high levels of corruption, an absence of effectively implemented anti-bribery legislation and a failure of the foreign government, media and local business community and civil society effectively to promote transparent procurement and investment policies.
- Sectoral risk** – some sectors are higher risk than others. Higher risk sectors include the extractive industries and the large scale infrastructure sector.
- Transaction risk** – certain types of transaction give rise to higher risks, for example, charitable or political contributions, licences and permits, and transactions relating to public procurement.
- Business opportunity risk** – such risks might arise in high value projects or with projects involving many contractors or intermediaries; or with projects which are not apparently undertaken at market prices, or which do not have a clear legitimate objective.
- Business partnership risk** – certain relationships may involve higher risk, for example the use of intermediaries in transactions with foreign public officials, consortia or joint venture partners, and relationships with politically exposed persons where the proposed business relationship involves, or is linked to, a prominent public official.

4.5 Factors affecting internal risk include:-

- Deficiencies in employee training, skills and knowledge;
- A bonus culture that rewards excessive risk taking;
- Lack of clarity in the organisations policies and procedures for hospitality and promotional expenditure, and political or charitable contributions;
- Lack of clear financial controls; and
- A lack of a clear anti-bribery message from the top-level management.

4.6 To meet the requirement of this principle the Council will:-

- Conduct risk assessment workshops throughout the organisation to determine the Authority's bribery risks.
- Conduct further and more detailed risk assessment workshops in identified key areas where exposure to bribery is considered to be high risk.
- Review the Core Performance System, which holds the Council's Risk Register, to incorporate specific bribery risks.

## 5. PRINCIPLE 4 – DUE DILIGENCE

*“The commercial organisation applies due diligence procedures, taking a proportionate and risk based approach, in respect of persons who perform or will perform services for or on behalf of the organisation, in order to mitigate identified bribery risks”*

5.1 Due diligence is firmly established as an element of corporate good governance and it is envisaged that due diligence related to bribery prevention will often form a wider part of the organisations due diligence framework.

- 5.2 The purpose of this principle is to encourage organisations to put in place due diligence procedures that adequately inform the application of proportionate measures designed to prevent persons associated with them from bribing on their behalf.
- 5.3 Organisations need to take considerable care in entering into certain business relationships and the appropriate level of due diligence to prevent bribery will vary enormously depending on the risk arising from the particular relationship.
- 5.4 Enquiries may need to be made to establish whether individuals or other organisations involved in key decisions, such as intermediaries, consortium or joint venture partners, contractors or suppliers have a reputation for bribery and whether anyone associated with them is being investigated or prosecuted, or has been convicted or debarred, for bribery or related offences. Organisations may also wish to consider the risks associated with politically exposed persons where the proposed business relationship involves, or is linked to, a prominent public office holder. Organisations may wish to ensure that enquiries are made of partners' internal anti-corruption measures.
- 5.5 A commercial organisations employees are presumed to be persons associated with the organisation for the purpose of the bribery act, therefore the organisation may need to incorporate into its recruitment and human resources procedures an appropriate level of due diligence proportionate to the risk associated with the particular post in question.
- 5.6 To meet the requirements of this principle the Council will:-
- Review and update Procedure Standing Orders and the Procurement Code of Practice; and
  - Review and update financial regulations.

## 6. PRINCIPLE 5 – COMMUNICATION (INCLUDING TRAINING)

*“The commercial organisation sees to ensure that its bribery prevention policies and procedures are embedded and understood throughout the organisation through internal and external communication, including training that is proportionate to the risks it faces.”*

- 6.1 Communication and training deters bribery by associated persons by enhancing awareness and understanding of a commercial organisation's procedures, and to the organisations commitment to their proper application. Making information available assists in more effective monitoring, evaluation and review of the bribery prevention procedures. Training provides the knowledge and skills needed to employ the organisations procedures and deal with any bribery related problems or issues that may arise.
- 6.2 Internal communications should convey the tone from the top but are also likely to focus on the implementation of the organisations policies and procedures and the implications for employees.
- 6.3 Another important aspect of internal communication is the establishment of a secure, confidential and accessible means for internal or external parties to raise concerns about bribery on the part of associated persons. If these procedures are to be effective there must be adequate protection for those reporting concerns.
- 6.4 External communication of bribery prevention policies through a statement or codes of conduct, for example can reassure existing and prospective associated persons and can act as a deterrent to those intending to bribe on an organisations behalf.

- 6.5 Training to staff within the organisation is likely to be effective in firmly establishing an anti-bribery culture. Training may be in the form of education and awareness raising, about the threats posed by bribery in general and those specific to the organisation in question and the various ways that it is being addressed.
- 6.6 General training could be mandatory for new employees as part of the induction process but it should also be tailored to the specific risks associated with specific posts. Consideration should also be given to tailoring training to the special needs of those involved in any high risk functions such as purchasing, contracting etc.
- 6.7 Effective training should be continuous, and regularly monitored and evaluated.
- 6.8 To meet the requirements of this principle the Council will:-
- Present a report to the Executive Team/Senior Management Team outlining the requirements of the new Act and updating them on actions taken to ensure the Council has preventative measures in place;
  - Raise awareness by rolling out an E-Tutorial for staff (with computer access) on Fraud, Bribery and Corruption;
  - Develop an awareness sessions for staff without computer access;
  - Place an article in the Wire and on the staff portal;
  - Use the Chief Executive's Brief to launch the awareness training;
  - Review Member Awareness Training;
  - Develop/Intranet information pages;
  - Issue a letter to all associated parties advising them of the organisations anti-bribery stance;
  - Raise Managers awareness of the Bribery Act; and
  - Raise Schools awareness of the Bribery Act.

## 7. PRINCIPLE 6 – MONITORING AND REVIEW

*"The commercial organisation monitors and reviews procedures designed to prevent bribery by persons associated with it and make improvements where necessary."*

- 7.1 The bribery risks that an organisation faces may change over time, as may the nature and scale of its activities, so the procedures required to mitigate those risks are likely to change. Organisations will therefore wish to consider how to monitor and evaluate the effectiveness of their bribery prevention procedures and adapt them where necessary.
- 7.2 Organisations may wish to consider the following factors in their monitoring and review procedures:
- Internal monitoring and review mechanisms
  - Transparency
  - External Verification
- 7.3 To meet the requirement of this principle the Council will:-
- Monitor investigations into bribery offences as part of the reactive fraud and corruption response and report all cases to the Standards Panel;
  - Report to the Audit Panel;
  - Update the Executive Team Assurance Questionnaires used for the production of the Annual Governance Statement to include Bribery.
  - Proactively publicise the high standards expected from the Council during all procurement exercises; and

- Share best practice and the learning from incidents with AGMA Councils via the Greater Manchester Chief Internal Auditors Fraud Group.

## **8. RECOMMENDATIONS**

That the report and the Action Plan are noted and approved for adoption by the Council.



# APPENDIX 1

## BRIBERY ACT – UPDATED ACTION PLAN

REF	PRINCIPAL	ACTION REQUIRED	DETAIL OF ACTION TO BE TAKEN	RESPONSIBLE OFFICER(S)	PROGRESS TO DATE
1	Proportionate Procedures	Review and update the Gifts and Hospitality Policy.	The policy will be revisited to ensure it is clear in light of the offences within the Act and the guidance produced by the Ministry of Justice.	Wendy Poole	Reviewed and updated.
2		Review and update the Whistle Blowing Policy.	The policy will be revisited to ensure it is clear in light of the offences within the Act and the guidance produced by the Ministry of Justice.	Wendy Poole	Reviewed and updated.
3		Review and update the Fraud Response Plan.	The draft document will be updated to make clear reference to the offences which can be committed under the Bribery Act.	Wendy Poole Alison Sands	Reviewed and updated.
4		Review and update the Money Laundering Procedures.	The draft procedures need to be finalised in light of the Act and approved.	Wendy Poole	In progress.  Procedures currently being reviewed and updated to include a full risk assessment.
5		Review and update the Recruitment and Selection Policy.	The policy will be reviewed to update the risk exposures that could occur if recruitment is not undertaken correctly. Emphasis will be placed on pre-employment screening.	Wendy Poole Tracy Brennan	In progress.  The recruitment and selection policy is currently being reviewed by Human Resources.  The revised version will include extra due diligence on posts that

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					are deemed to be in a high risk area.
6	Proportionate Procedures	Review and update the Disciplinary Procedures.	The procedures will be reviewed to ensure that they make reference to Bribery as being a disciplinary offence.	Wendy Poole Tracy Brennand	In progress.  These have been updated and have been issued to Human Resources for review.
7		Review and update the Induction Process.	The Induction Checklist will be amended to make reference to the Anti Fraud and Corruption - Statement of Intent, the Fraud Response Plan and the Whistle Blowing Policy so that new employees are aware of the standards expected and the ways in which wrong-doing can be reported and how it will be dealt with.	Wendy Poole Tracy Brennand	In progress.  These have been updated and have been issued to Human Resource for review.
8		Review and update Standard Contract Documentation.	Documentation in relation to contracts and the whole procurement process will be reviewed to ensure that details are included about bribery at the earliest opportunity to eliminate the risk.	Wendy Poole Paul Turner	In progress.  A standard bribery clause for all contracts and partnership agreements has been drafted and needs to be reviewed by Legal.  The Pre Qualification Questionnaire has been amended to include questions regarding 3 <sup>rd</sup>

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	Proportionate Procedures				<p>Party Bribery Polices.</p> <p>A bribery impact assessment is to be created to enable officers involved in procurement to assess the risk of bribery for the particular contract in question. If deemed to be a high risk then further work will be required before the contract is awarded in relation to due diligence.</p>
9		Review and update Partnership Agreements.	Documentation in relation to partnerships and the whole procurement process will be reviewed to ensure that details are included about bribery at the earliest opportunity to eliminate the risk.	Wendy Poole Paul Turner	<p>In progress.</p> <p>Corporate guidance in relation to partnership agreements is being drafted and consultation will take place to ensure that bribery is covered adequately in the document.</p>
10		Review and update the Code of Conduct for Employees.	Consultation will take place with the Executive Director Governance to ensure the code covers bribery.	Wendy Poole Sandra Stewart	Reviewed and Updated.
11	Top Level Commitment	Review the Anti Fraud and Corruption Statement of Intent, clearly referring to the new Bribery Act 2010 and the potential offences.	The Statement of Intent will be updated to explicitly include bribery offences as specified by the Act.	Wendy Poole Alison Sands-	Reviewed and Updated.

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12	Risk Assessments	<p>Conduct risk assessment workshops throughout the organisation to determine the Authority's bribery risks.</p> <p>Conduct further and more detailed risk assessment workshops in identified key areas where exposure to bribery is considered to be high risk.</p>	<p>Members of the Risk Management and Audit Team will conduct risk workshops throughout the organisation to determine the Authority's bribery risks.</p> <p>Once high risk areas have been identified further detailed risk workshops will be undertaken to ensure that the risk of bribery are appropriately mitigated.</p>	Wendy Poole Peter Wilson	<p>In progress.</p> <p>Risk workshops are currently underway with all Service Areas within the organisation. These will assist with raising awareness of the Bribery Act and will also enable us to determine the high risk areas within the organisation.</p> <p>Once all risk workshops have been completed a detailed risk assessment for the organisation will be drawn together and further work undertaken with high risk areas.</p>
13		Review the Core Performance System, which holds the Council's Risk Registers to incorporate specific bribery risks.	To ensure everybody considers the risk of bribery, a specific risk will be added into the operational risk section which has to be assessed by all managers.	Wendy Poole Peter Wilson IT Services	<p>Reviewed and Updated.</p> <p>A bribery risk has been added to the core performance system and all managers have to assess it as part of their 2011/12 update of the Core Performance system.</p>
14	Due Diligence	Review and update Procurement Standing Orders and the Procurement Code of Practice.	Both documents will need to be reviewed to cover the offences under the Act and enhance the guidance included to minimise the potential risk of exposure to bribery.	Wendy Poole Paul Turner	It is recommended that an additional clause is added to Procurement Standing Orders as follows:-

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					<p><b>E2 Bribery</b> Potential contracts should be assessed for bribery risks and if deemed to be high then enhanced due diligence should be applied. Officers involved in procurement need to ensure that they do not receive or offer a bribe and award all contracts in line with the Procurement Code of Practice.</p>
15		Review and update Financial Regulations.	Updated to reflect the Act and the offences therein.	Wendy Poole	Reviewed and Updated.
16	Communication	Present a report to the Executive Team/Senior Management Team outlining the requirements of the new Act and updating them on actions taken to ensure the Council has preventative measures in place.	A report will be presented by the Head of Risk Management and Audit Services to update the Executive Team/Senior Management Team on the main points of the Act and the action being taken to ensure Tameside has preventative measures in place.	Wendy Poole	To be undertaken once documents approved by the Standards Committee for adoption.
17		Raise awareness by rolling out an E-Tutorial for staff (with computer access) on Fraud, Bribery and Corruption.	The E-Tutorial will be rolled out.	Wendy Poole Alison Sands Claire Cunningham	In progress.  This is currently in the process of being written in conjunction with the Fraud Officer. To be launched after all documents have been approved.

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18	Communication	Develop an awareness session for staff without computer access.	Managers in areas where staff do not have access to the staff portal will be contacted to discuss the best option for delivering the awareness training.	Alison Sands Claire Cunningham	In progress.  This is currently in the process of being written in conjunction with the Fraud Officer. To be launched after all documents have been approved.
19		Place an article in the Wire and on the staff portal.	Awareness article will be written to inform all staff of the potential offences under the Act and how to avoid them.	Wendy Poole Alison Sands	This has been written.
20		Use the Chief Executive's Brief to launch the awareness training.	To demonstrate commitment from the top the Chief Executives Brief will be used to launch the awareness training.	Wendy Poole	To liaise with Julie Speakman once training is fully devised.
21		Review member awareness training.	Members need to be briefed on the offences the Act now presents and how they can protect themselves and the Council from challenge.	Wendy Poole	A guidance note has been created to make Members aware of the Bribery Act.  This also needs to be addressed as part of the induction for new members.  The Code of Conduct for Members is a national code of conduct that we have adopted. Therefore, no amendments have been made to this document.

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22	Communication	Develop Intranet/Internet information pages.	The creation of pages on the Intranet/Internet is ongoing and the Bribery Act will be added to the list of contents.	Claire Cunningham Wendy Poole	In progress.
23		Issue a letter to all associated parties advising them of the organisations anti-bribery stance.	All our associated parties are to be identified. This will be as part of the risk workshops that are being undertaken, examination of the partnership register and the contracts register. A letter will be issued to all associated parties, advising them of the Authority's zero tolerance to bribery.	Wendy Poole	Letter has been written.  The list of associated parties is still being collated as not all of the risk workshops have yet been completed.
24		Raise Managers awareness of the Bribery Act.	A guidance note to be created for all Senior Manager informing them of the zero tolerance to bribery and the need for them to communicate this according to their staff.	Wendy Poole	Guidance has been written.
25		Raise Schools awareness of the Bribery Act.	A guidance note to be created for all Headteachers and Governors informing them of the new Act and to ensure that they have appropriate procedures within their School to prevent any acts of Bribery.	Wendy Poole Jim Taylor	Guidance has been written.

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26	Monitoring and Review	Monitor investigations into bribery offences as part of the reactive fraud and corruption response and report all cases to the Standards Panel.	The register used to record and monitor investigations conducted will be amended to ensure any allegations of bribery are included and highlighted. All investigations are reported to the Standards Panel on a regular basis.	Claire Cunningham Alison Sands Wendy Poole	Ongoing.
27		Report to the Audit Panel.	Future Progress Reports presented by the Head of Risk Management and Audit Services to the Audit Panel will cover the requirements of the guidance.	Wendy Poole	Ongoing.
28		Update the Executive Team Assurance Questionnaires used for the production of the Annual Governance Statement to include Bribery.	The annual questionnaires will be amended to cover bribery explicitly.	Wendy Poole	Implemented for Annual Governance Statement 2010/2011.  The following question was added to the Executive Team Assurance Questionnaire – “The Service has in place adequate arrangements/internal controls to ensure that Fraud, Bribery and Corruption are minimised”.
29	Monitoring and Review	Proactively publicise the high standards expected from the Council during all procurement exercises.	This will be discussed with Legal and Procurement to ascertain the best way of publicising the message of zero tolerance.	Wendy Poole Paul Turner Ben Jay	Will be undertaken when all documents have been approved, adopted, disseminated and all training delivered.



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R E F	PRINCIPAL	ACTION REQUIRED	DETAIL OF ACTION TO BE TAKEN	RESPONSIBLE OFFICER(S)	PROGRESS TO DATE
30		Share best practice and the learning from incidents with AGMA Councils via the Greater Manchester Chief Internal Auditors Fraud Group.	Share best practice and learning.	Wendy Poole Claire Cunningham	Ongoing.