



IVYBRIDGE TOWN COUNCIL ANTI-BRIBERY STATEMENT



JANUARY 2022

Please also see Anti Bribery Policy dated 31.01.22

Ivybridge Town Council is committed to applying the highest standards of ethical conduct and integrity to its business activities. When acting on behalf of the Council you are responsible for maintaining the Council's reputation and for conducting business honestly and professionally.

The integrity and reputation of the Council depends on the honesty, fairness and integrity brought to the job by everyone associated with the Council

The Council will not tolerate any form of bribery, whether direct or indirect, by, or of, its employees, agents or consultants or any persons or companies or companies acting on its behalf.

The Council's senior management are committed to implementing and enforcing effective systems throughout the Council to prevent, monitor and eliminate bribery, in accordance with its obligations under the Bribery Act 2010. which includes the offences of bribing another person, of allowing to be bribed and organizational responsibility.

The Council's Anti-Bribery policy outlining its position on preventing and prohibiting bribery is available in the Council's offices and on the Council's website.

The Council's Anti-Bribery procedures apply to all employees and Members, as well as agency workers, consultants and contractors.

All employees and any other individuals acting on behalf of the Council are required to familiarise themselves with and comply with the Council's Anti-Bribery procedures.

A definition issued in 2019 concerning the Bribery Act 2010 states that 'The offence of bribing a person includes offering, promising or giving a financial or other advantage intended to induce or reward improper conduct, or knowing or believing its acceptance to amount to improper conduct. 'Improper' means breaching an expectation of good faith, impartiality or trust. The bribe does not actually have to be given; just offering it, even if not accepted, could be sufficient to constitute bribery. In addition, the offer does not have to be explicit; any offer made through a third party will fall under the Act.

An individual being bribed also commits an offence under the Act. This includes requesting, agreeing to receive, accepting a financial or other

advantage where that constitutes improper conduct, or intending improper conduct to follow, or as a reward for acting improperly’.

The Act also covers a Commercial organisation’s responsibility for a person associated with the organisation bribing, or attempting to bribe, another person for the purpose of obtaining or retaining business for the organisation

All employees and any other person acting on behalf of the Council are prohibited from offering, giving, soliciting accepting, or agreeing to accept, whether financial or any other form of inducement to or from any person or company in a way which is unethical or in order to gain any personal advantage, monetary or otherwise, for themselves or anyone connected with them.

The Council may continue to provide bona fide hospitality to clients and incur promotional expenditure. However, all such expenditure must be transparent, proportionate, reasonable and authorised in advance, in accordance with the Council’s anti-bribery procedures.

In the course of providing services to clients, or in dealings with suppliers, or any other person having similar connections to the Council, employees should under no circumstances accept money, gifts or other forms of reward with a value exceeding £25 without prior consent from the Town Clerk. All such reported gifts shall be recorded.

Inevitably, decisions as to what is acceptable may not always be easy. If anyone is in doubt as to whether a potential act constitutes bribery, the matter should be referred to the Town Clerk before proceeding,

Any breach of the Council’s Anti-Bribery procedures will normally be treated as Gross Misconduct.

Employees should also note that bribery is a criminal offence.

The Council will not conduct business with third parties including clients, suppliers, agents or representatives who are not prepared to support its anti-bribery stance.

Cllr Phillip Dredge
06.01.20 Reviewed 31.01.22