

Anti-Bribery and Anti-Corruption Policy

Reviewed and adopted 21 May 2025; 20 May 2026 [minute ref: 076/26]

Next review date: May 2027

1. Purpose

Ripley Parish Council is committed to conducting its business with integrity, transparency and accountability. The Council will not tolerate bribery, corruption, improper influence, or the misuse of public office for private gain.

This policy applies to councillors, officers, contractors, suppliers, consultants, volunteers and any other person acting for or on behalf of the Council.

2. Legal framework

The Bribery Act 2010 came into force on 1 July 2011. The main offences under the Act are:

- a. offering, promising or giving a bribe;
- b. requesting, agreeing to receive or accepting a bribe;
- c. bribing a foreign public official; and
- d. failure by a relevant commercial organisation to prevent bribery by persons associated with it.

The maximum penalty for bribery offences may include imprisonment of up to 10 years and/or an unlimited fine.

3. Council position

The Council prohibits:

- a. offering, promising, giving, requesting, agreeing to receive or accepting any bribe, reward, inducement or improper advantage;
- b. accepting gifts or hospitality where this could reasonably be perceived as influencing Council business or decision-making;
- c. making or accepting facilitation payments;
- d. using Council position, information, contracts, assets or influence for improper private advantage; and

e. seeking to influence planning, procurement, grant, employment or other Council decisions through improper payments, gifts or hospitality.

4. Bribery prevention principles

The Council will apply proportionate procedures having regard to the six principles set out in Government guidance:

- a. proportionality;
- b. top-level commitment;
- c. risk assessment;
- d. due diligence;
- e. communication, including training where appropriate; and
- f. monitoring and review.

The Council will keep this policy under review and will consider bribery and corruption risks where relevant, particularly in relation to procurement, contracts, grants, land/property matters, planning engagement and dealings with developers or third parties.

5. Gifts and hospitality

Councillors and officers must not accept gifts or hospitality which could improperly influence, or appear to influence, their judgement.

Any gift or hospitality with an estimated value of more than £25 must be declared to the Clerk and entered in the Council's Gifts and Hospitality Register.

Gifts or hospitality should not be accepted where they are offered by a person or organisation which has, or may have, business before the Council, including planning, procurement, contract, lease, licence or grant matters, unless the acceptance is clearly reasonable, proportionate and incapable of being interpreted as improper influence.

6. Facilitation payments

Facilitation payments are payments made to secure or speed up a routine process or decision. The Council regards facilitation payments as bribes. They must not be offered, made, requested or accepted.

7. Reporting concerns

Any councillor or officer who is offered a bribe, suspects bribery, or has concerns about improper influence must report the matter as soon as possible to the Clerk and/or the Monitoring Officer.

The report should include, where known:

- a. the background to the concern;
- b. names of those involved;
- c. relevant dates and places;
- d. any documents, correspondence or evidence; and
- e. the reasons for the concern.

It is not necessary to prove that bribery has occurred before raising a concern.

Where the concern involves the Clerk, the matter should be reported to the Chair of the Council and/or the Monitoring Officer.

8. Breach of policy

A breach of this policy may result in referral to the Monitoring Officer, disciplinary action, termination of contract, referral to the police or other appropriate action.

Councillors are also subject to the Council's Code of Conduct. Officers are subject to their employment terms and relevant Council policies.