

Agenda item 9
AGS/28/22

Report title: Updated Anti Bribery and Corruption Policy 2022	
Report to: Audit, Governance and Standards Committee	
Report author: Paula Clowes, Head of Assurance	
Date: 31 October 2022	For: Approval
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County Divisions affected: All Essex	

1. Everyone's Essex

- 1.1 The Audit Governance and Standards Committee has a role to maintain oversight and to monitor the effectiveness of internal controls, governance and risk management arrangements as well as the work of the Counter Fraud team and any areas of the Council that may be impacted by the risk of Bribery and Corruption.
- 1.2 This policy sets out the provisions that the Council has put in place to identify and prevent any attempts to bribe Essex County Council officials and to set out the corporate proportionate procedures that Essex County Council has put in place.

2. Recommendations

- 2.1 The Anti Bribery and Corruption Policy 2022 be approved in the form appended to the report.

3. Background

- 3.1 The Council's current Anti- Bribery and Corruption Policy was approved by Audit Governance and Standards Committee in January 2020. It has now been reviewed and updated in line with our review process.
- 3.2 The refreshed Anti- Bribery and Corruption Policy 2022 is attached at appendix 1.
- 3.3 The following changes have been made as part of the review for 2022:
 - Front Page - Date change from January 2020 to October 2022
 - Page 7 – updated the link to Essex County Council's revised Whistleblowing Policy

- Page 8 – updated the reference to the external whistleblowing line and contact details – amended from Expolink to EthicsPoint
- Page 8 – updated the links to Protect and Department for Business Innovation and Skills (Blowing the whistle to a prescribed person)
- Appendix 1 – updated the extract from the revised Whistleblowing Policy and contact details
- Back page – date change from January 2020 to October 2022.

3.4 It is good practice to review the policy every two years. The next review is therefore due in 2024.

4. Links to our Strategic Ambitions

4.1 A strategic approach to risk management and is critical in ensuring that the Council successfully mitigates its risks in all areas of work to ensure vital services continue to be delivered and available resources reach those most in need and the council remains resilient. This report links to the following aims in the Essex Vision.

- Enjoy life into old age
- Provide an equal foundation for every child
- Strengthen communities through participation
- Develop our County sustainably
- Connect us to each other and the world
- Share prosperity with everyone

4.2 This report links to the following strategic priorities in the emerging Organisational Strategy 'Everyone's Essex':

- A strong, inclusive and sustainable economy
- A high quality environment
- Health wellbeing and independence for all ages
- A good place for children and families to grow

5. Financial implications

5.1 There are no financial implications as the risk management activity will be met within existing resources.

6. Legal implications

- 6.1 The Accounts and Audit Regulations 2015 require the Council to have a sound system of internal control which includes a requirement to have adequate arrangements for the management of risk. The strategy sets out our arrangements and is thus a key way of complying with those regulations.

7. Equality and Diversity Considerations

- 7.1 The Public Sector Equality Duty applies to the Council when it makes decisions. The duty requires us to have regard to the need to:
- (a) Eliminate unlawful discrimination, harassment and victimisation and other behaviour prohibited by the Act. In summary, the Act makes discrimination etc. on the grounds of a protected characteristic unlawful
 - (b) Advance equality of opportunity between people who share a protected characteristic and those who do not.
 - (c) Foster good relations between people who share a protected characteristic and those who do not including tackling prejudice and promoting understanding.
- 7.2 The protected characteristics are age, disability, gender reassignment, pregnancy and maternity, marriage and civil partnership, race, religion or belief, gender, and sexual orientation. The Act states that 'marriage and civil partnership' is not a relevant protected characteristic for (b) or (c) although it is relevant for (a).
- 7.3 The equality impact assessment indicates that this strategy will not have a disproportionately adverse impact on any people with a particular characteristic.

8 List of Appendices

Appendix A - Anti- Bribery and Corruption Policy 2022

9 List of Background papers

None