

# Anti-Bribery Policy



**HILLINGDON**  
LONDON

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## 1. Introduction

As a public body and provider of essential public services, Hillingdon Council recognises that its elected officials and officers are at risk of being bribed in relation to these services. As such the Council seeks to actively prevent bribery by identifying bribery risk, implementing measures to minimise and control this risk, and ensuring compliance with all relevant legal requirements.

This Anti-Bribery Policy is in line with the Counter Fraud Strategy and sets out the procedures to be followed to enable the Council to manage bribery risks and comply with its legal obligation to prevent bribery.

Instances of alleged bribery will be appropriately investigated, and the Council will assist other authorities and agencies, e.g. the Police, with any resultant prosecution.

In its response to bribery, the Council will be guided by the [Ministry of Justice Guidance](#) on the Bribery Act 2010. Although the Council is not a commercial organisation within the meaning of the Act, it will treat the guidance as good practice in terms of the principles for preventing bribery.

## 2. Scope

This Policy applies to all Council staff - permanent, temporary, agency, contractors, executives, agents, members, volunteers and consultants. All have a responsibility to be alert to the risk of bribery and report suspicions or incidents where appropriate.

## 3. Principles

This policy is based on the following principles:

- To ensure that allegations/concerns relating to bribery are triaged and dealt with by the correct responsible officers.
- To give guidance on how to refer an allegation relating to bribery or corruption.

## 4. What is Bribery?

Bribery is when a person offers, promises or gives a financial or non-financial advantage to another person with the intention to induce a person to perform a relevant function or activity improperly, or to reward a person for improper performance of such a function or activity.

Bribery is a criminal offence under the Bribery Act 2010. **The Council does not offer, nor does it accept any improper offers, bribes or inducements.**

## 5. Reporting Incidents and Suspicions

Any concerns that a bribe or inducement is being offered, or that a member of staff has accepted or requested a bribe or inducement, must be reported via line management and/ or relevant Head of Service, who must report it via the methods below.

If the concern relates to the line manager, then it can be reported directly via one of the options below (as per the Council's Whistleblowing Policy):

- **In person:** Head of Counter Fraud or Borough Solicitor & Monitoring Officer
- **24 hour hotline:** freephone number 0800 389 8313
- **Email:** [fraud@hillingdon.gov.uk](mailto:fraud@hillingdon.gov.uk)
- **Write to:** Head of Counter Fraud or Borough Solicitor at Civic Centre, High Street, Uxbridge, UB8 1UW (envelopes should be marked '**Private & Confidential**')

## 6. Staff Responsibilities

All suspicions that an offer of a bribe or inducement is being made, accepted or requested, in relation to the work or services of the Council, must immediately be reported as per section 5 of this policy.

Any report which falls within the scope of a 'protected disclosure' under the Whistleblowing Policy will be treated accordingly.

Failure by a member of staff to comply with the requirements of this Policy may lead to disciplinary action being taken against them. Any disciplinary action will be dealt with in accordance with the [Council's Disciplinary Policy and Procedure](#).

## 7. Gifts, Hospitality and Facilitation Payments

This policy is not intended to change the requirements of the Gifts and Hospitality Policy.

A facilitation payment may be described as a payment to induce officials to perform routine functions they are otherwise obligated to perform. Typically, these services are a part of the official's job, but the payment may be used to expedite the process or alter the outcome.

Under the Bribery Act 2010 facilitation payments are considered to be bribes and a criminal offence. **The Council does not offer, nor does it accept any facilitation payments.**

## 8. Administration

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<b>Policy owned by</b>	<b>Alex Brown</b>	<b>Policy approved by</b>	<b>Cabinet</b>

### Version History

<b>Version</b>	<b>Approved by</b>	<b>Revision date</b>	<b>Description of change</b>	<b>Author</b>
<b>1.0</b>	<b>Cabinet</b>	<b>1<sup>st</sup> April 2024</b>	<b>Revised policy</b>	<b>Alex Brown</b>