

**Bribery Act Compliance Action Plan**

<p><b>Section 1 : Current Situation</b>  <b>Governance framework currently in place</b>          All officers and Members of the Council are bound by policies which ensure that all actions are lawful, transparent, ethical and accountable. The Policies and Procedures which make up this framework include</p>		
<p>A Constitution, which includes the following:</p> <ul style="list-style-type: none"> <li>• Members' Code of Conduct;</li> <li>• Standards Committee Terms of Reference;</li> <li>• Council Procedure Rules;</li> <li>• Scheme of Delegation of Functions to Cabinet Members;</li> <li>• Executive Procedure Rules;</li> <li>• Overview and Scrutiny Board and Committees Terms of Reference;</li> <li>• Overview and Scrutiny Procedure Rules;</li> <li>• Scheme of Delegation of Functions to Officers;</li> <li>• Budget and Policy Framework Procedure Rules;</li> <li>• Contract Procedure Rules;</li> <li>• Officer Employment Procedure</li> </ul>	<p>Various strategies and policies, including</p> <ul style="list-style-type: none"> <li>• Anti-fraud and Corruption Policy;</li> <li>• Corporate Procurement and Commissioning Strategy;</li> <li>• Sustainable Procurement Policy and Guidance;</li> <li>• Whistle-blowing Policy;</li> <li>• Investment Strategy;</li> <li>• Enterprise Strategy; and Full Employment Strategy</li> </ul>	<p>Frameworks and Plans, including a:</p> <ul style="list-style-type: none"> <li>• Employment and Enterprise Investment Framework;</li> <li>• Rural Economy Plans; and</li> <li>• Liverpool City Region Employment and Skills Strategy and Commissioning Plan</li> </ul> <p>Other instruments, including:</p> <ul style="list-style-type: none"> <li>• Terms and Conditions for the Supply of Goods;</li> <li>• Terms and Conditions for Services;</li> <li>• Partnership Toolkit;</li> <li>• Guide for suppliers/How to do business with Wirral MBC;</li> <li>• The Chest, the North West's Local Authority Procurement Portal;</li> <li>• Small Business Friendly</li> </ul>

<p>Rules;</p> <ul style="list-style-type: none"> <li>• Officer Code of Conduct;</li> <li>• Protocol on Member/Officer Relations; and</li> <li>• Code of Corporate Governance</li> </ul>		<p>Concordat; and</p> <ul style="list-style-type: none"> <li>• Wirral Compact (agreement with the Local Voluntary and Community Sector and Wirral MBC);</li> </ul>
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<p><b>Section 2:</b>  <b>Actions required to comply with the 6 principles set out in the Ministry of Justice Guidance</b></p>		
Principle	What is required	How this will be achieved
Principle 1-Proportionate Procedures	Adequate, Proportionate Anti Bribery policies and procedures need to be in place, which articulate the Council's anti bribery stance.	<ul style="list-style-type: none"> <li>• Obtaining Council Approval for the Anti Bribery Policy</li> <li>• Scrutinising existing Policies and Procedures to ensure compliance (in particular with regard to Procurement and Recruitment)</li> <li>• Scrutinising Council documents to ensure compliance with anti bribery stance (e.g. tender documents/ PQQs / planning documents/ recruitment documents etc</li> <li>• Risk assessment of all bribery risks within the Council to ensure that policies and procedures specific to risk areas are adequate.</li> </ul>

Principle 2- Top level commitment	Top level Political and Executive commitment to the anti bribery stance of the Council which is cascaded internally to all officers and Members and externally to all suppliers/agents and others must be in evidence.	<ul style="list-style-type: none"> <li>• Political endorsement for the Anti Bribery Policy and this action plan</li> <li>• Internal and external communication of the anti bribery stance of the Council through various media such as the Team Brief process, the Intranet, One council magazine etc.</li> <li>• Promotion of the Anti Bribery policy</li> </ul>
Principle 3- Risk Assessment	A periodic informed and documented assessment of the Council's exposure to the internal and external risk of bribery on its behalf by persons associated with the Council must be undertaken.	<ul style="list-style-type: none"> <li>• Chief Officers to identify areas within their area of operation which may be vulnerable to the risk of Bribery</li> <li>• Due diligence enquiries to inform risks associated with third parties</li> <li>• Accurate and appropriate documentation of the risk assessment and its conclusions</li> <li>• Periodic revisiting of risk assessments by Chief Officers to ensure new and emerging risks are anticipated.</li> </ul>
Principle 4- Due Diligence	The Council must apply due diligence procedure taking a proportionate and risk based approach in respect of persons who perform or will perform services for or on behalf of the Council	<ul style="list-style-type: none"> <li>• Third party intermediaries to be identified and documented by Chief Officers (e.g. Partnerships/ suppliers/ agency staff)</li> <li>• Proportionate due diligence to be</li> </ul>

	<p>in order to mitigate identified bribery risks.</p>	<p>applied to all those identified to ensure that their stance against bribery accords with that of the council.</p> <ul style="list-style-type: none"> <li>• All new associated persons to be subject to due diligence (eg new suppliers/ employees/agency staff)</li> </ul>
<p>Principle 5- Communication (including Training)</p>	<p>The Council needs to ensure that the anti Bribery policies and procedures are embedded and understood throughout the organisation through internal and external communication including training that is proportionate to the risks faced.</p>	<ul style="list-style-type: none"> <li>• Online fraud awareness training which includes details of anti bribery procedures to be rolled out to all online employees.</li> <li>• Face to face training to be provided to relevant employees and Members.</li> <li>• Communications channels identified in principle 2 (above) to be employed.</li> <li>• Staff/Members and others to be encouraged to report any suspicions of actual bribery or susceptibility to bribery through appropriate channels to appropriate officers of the council.</li> <li>• Staff/Members and others to be encouraged to make any suggestions for improvement of bribery prevention procedures to appropriate officers of the council.</li> </ul>

		<ul style="list-style-type: none"> <li>• External communication of the council's anti bribery stance to suppliers/agents/others.</li> <li>• Internal and external communication of sanctions to be imposed in respect of bribery and rules governing recruitment, procurement and tendering.</li> </ul>
Principle 6- Monitoring and Review	The Council monitors and reviews procedures designed to prevent bribery by persons associated with the council and makes improvements where necessary.	<ul style="list-style-type: none"> <li>• Staff surveys questionnaires and feedback forms to be utilised to monitor understanding</li> <li>• Chief Officers to undertake periodic risk assessments of bribery risks.</li> <li>• Internal audit to review and assess actions taken by Chief officers and make appropriate recommendations for improvement.</li> </ul>