



## ANTI-BRIBERY AND CORRUPTION POLICY

### 1. Introduction

This Anti-Bribery and Corruption Policy ('Policy') outlines Camborne Town Council's commitment to conducting its activities ethically and transparently. As a UK local government entity, Camborne Town Council is subject to the Bribery Act 2010 and other relevant legislation. This Policy applies to all members, employees, contractors and any individuals acting on behalf of Camborne Town Council.

### 2. Policy Statement

Camborne Town Council operates a zero tolerance approach to bribery and corruption. Any form of bribery or corruption is prohibited, and all Council representatives must act honestly, with integrity, and in compliance with all relevant laws and regulations, including but not limited to Sections 1, 2 and 6 of the Bribery Act 2010.

### 3. Scope

This Policy applies to:

- All members of Camborne Town Council, including elected officials and employees.
- Contractors, consultants, suppliers and other third parties acting on behalf of Camborne Town Council, must acknowledge and agree to comply with this Policy, as part of their contracts.
- All activities undertaken during Council operations, whether within or outside the UK.

### 4. Definitions

- **Bribery:** Offering, promising, giving, requesting, or accepting an advantage (financial or otherwise) as an inducement to act improperly.
- **Corruption:** Abuse of power for personal gain or to benefit others inappropriately.
- **Facilitation Payments:** Small, unofficial payments to expedite routine government actions.

## **5. Prohibited Conduct**

Council Representatives must not:

- Offer, give, or promise any bribe or corrupt payment.
- Solicit or accept any bribe or corrupt payment.
- Engage in any activity that could be perceived as corrupt, improper, or dishonestly seeking to bring others into disrepute for political gain.
- Make or accept facilitation payments.
- Fail to report suspected bribery or corruption.

## **6. Gifts and Hospitality**

Council Representatives must not offer or accept gifts or hospitality that could influence or be perceived to influence decision-making.

Examples of acceptable gifts or hospitality include low-value items such as promotional pens or modest refreshments at a meeting. Unacceptable gifts or hospitality include cash, lavish meals or expensive event tickets connected with a decision-making process.

Any gift or hospitality offered or received over the value £25 must:

- Be proportionate and reasonable.
- Be recorded in the Council's Gifts and Hospitality Register.
- Be approved by the appropriate authority, as outlined in the Council's governance procedures.

## **7. Reporting and Whistleblowing**

All Council Representatives have a duty to report any suspected bribery or corruption. Reports should be made to the Monitoring Officer or the designated anti-corruption lead. The Council will treat all reports confidentially and protect whistleblowers from retaliation in line with its Whistleblowing Policy.

## **8. Consequences of Non-Compliance**

Failure to comply with this Policy may result in disciplinary action, up to and including dismissal, and may also result in criminal prosecution. Contractors or third parties found in breach may have their contracts terminated and may be reported to law enforcement authorities.

## **9. Responsibilities**

- The Council is responsible for ensuring that adequate anti-bribery and corruption controls are in place.
- The Town Clerk and/or Deputy Town Clerk oversee the implementation and enforcement of this Policy.
- All Council Representatives must:

- Understand and comply with this Policy.
- Complete any required training on anti-bribery and corruption.
- Report any concerns or breaches promptly.

## **10. Policy Review**

This Policy will be reviewed annually or as required to reflect changes in legislation, best practices, or operational requirements. The review will include consultation with relevant stakeholders to ensure the Policy reflects diverse needs and perspectives.

## **11. Approval and Communication**

Camborne Town Council approves this Policy, effective from 15<sup>TH</sup> January 2026. It must be communicated to all relevant stakeholders and incorporated into Camborne Town Council's operational practices.