

ANTI BRIBERY & CORRUPTION POLICY

Reviewed:
Next Review:

M Cameron
Head of Internal
Audit

March 2026
January 2029

CONTENTS

1. Introduction.....	3
2. Bribery.....	3
3. Corruption.....	4
4. Reporting.....	4
5. Corporate Framework and Culture.....	4

1. Introduction

- 1.1 Enfield Council is committed to the principles of good governance and recognises the importance of operating in a transparent and accountable manner, whilst demonstrating high standards of conduct. **The Council has a zero tolerance of bribery and corruption** as this would damage the Council's reputation and have a negative impact on the public purse.
- 1.2 The Council expects everyone working for or on behalf of the Council to act honestly, with integrity and to safeguard the public purse. This includes all Councillors, staff, agency workers, volunteers, partners, and contractors. The Council has an overarching Behaviour and Competency Framework in place with several policies setting out expected behaviour. These policies are listed in paragraph 6.2.
- 1.3 The Leader of the Council and the Chief Executive demonstrate the Council's commitment to combat bribery and corruption by endorsing the Counter Fraud, Bribery and Corruption Statement, which is part of the Counter Fraud Strategy and Response Plan 2025-28.
- 1.4 The Counter Fraud Strategy and Response Plan 2025-28 details the Council's response to tackling fraud and associated offences, including bribery and corruption.

2. Bribery

- 2.1 A bribe is intended to induce a person to improperly perform a relevant function or activity, or to reward a person to improperly perform a relevant function. The reward can be a financial or other advantage.
- 2.2 The Bribery Act 2010 outlines 4 key offences related to bribery:
 - offering, promising, or giving of a bribe to another person
 - requesting, agreeing to receive, or accepting a bribe
 - bribery of a foreign (non-UK) public official
 - failure by commercial organisations to prevent bribery committed by their associated persons to obtain or retain business, or an advantage in the conduct of business.
- 2.3 Facilitation payments are payments to induce officials to perform routine functions they are otherwise obligated to perform, to speed up the process or alter the outcome.
- 2.4 Facilitation payments are a form of bribery.

3. Corruption

3.1 Corruption covers a broad range of behaviours and is usually referred to as the abuse of entrusted power. This may be in relation to legal, ethical or moral behaviour.

3.2 Corruption includes activities such as:

- **Nepotism** - individuals in positions of authority or influence show undue favouritism towards family members or relatives—such as appointing them to roles or granting them opportunities—regardless of their qualifications or merit
- **Patronage** – using power or influence to control appointments to positions / privileges
- **Cronyism** – appointing friends or close associates to positions of authority or influence, regardless of their suitability or qualifications for the role.

4. Reporting

4.1 The Council expects those working for or on its behalf to report concerns of bribery and corruption as soon as they become aware of the concerns.

4.2 Concerns must be reported in accordance with the [whistleblowing policy](#) via either:

- SpeakOut@enfield.gov.uk; or
- Fraud.team@enfield.gov.uk

5. Corporate Framework and Culture

5.1 The Council believes that a culture of honesty and openness is a key element in preventing and tackling bribery and corruption. Codes of Conduct for members and employees are based on general principles which reflect the 7 Principles of Public Life commonly referred to as the “Nolan Principles”. These principles are:

- | | |
|------------------|--------------|
| • Selflessness | • Openness |
| • Integrity | • Honesty |
| • Objectivity | • Leadership |
| • Accountability | |

Further information regarding the 7 Principles of Public Life can be found [here](#).

5.2 Expected behaviours for those working for or on behalf of the Council are included in the following:

- **HR & Development related policies, procedures and training:**
 - Members' Code of Conduct
 - Employee Code of Conduct
 - Recruitment and selection policies and related training
 - Requirement to declare conflicts of interest and secondary employment as part of the Council's performance review framework
 - Gifts and hospitality declaration process
 - Employee induction programmes
 - Manager Handbook
 - Employee Handbook
 - Agency Workers' Handbook
 - Disciplinary procedures
 - Leadership training courses
 - EDI training courses
- **Counter Fraud related policies and procedures and training:**
 - Counter Fraud, Bribery and Corruption Statement
 - Whistleblowing policy
 - Counter Fraud Sanction and Prosecution policy
 - Regulation of Investigatory Powers Act 2000 (RIPA) Procedures
 - Anti-Money Laundering Policy and Guidance
 - Counter Fraud Strategy and Response Plan 2025-28
 - Fraud awareness training
- **Procurement related policies and procedures:**
 - The Constitution (including Financial Regulations and Contract Procedure Rules)
 - Contract Procedure Rules and related training
- **IT related policies, procedures and training, including:**
 - Acceptable Use policy
 - Access Control policy
 - Cyber Security policy
 - Data Protection policy
 - Information Classification and Handling policy
 - Members Information Security policy
 - Physical and Environmental Security policy
 - Software Acceptable Usage policy
 - Third Party Access and Management policy
 - Mandatory information rights and cyber security training