

To be reviewed Annually



ANTI-BRIBERY POLICY

Created:2025

Reviewed: 18.05.2026

Next review date – May 2027

Introduction

Denbigh Town Council is committed to maintaining the highest standards of ethical conduct and integrity in all business activities. This policy outlines [Council Name]'s stance on preventing and prohibiting bribery, in full compliance with the Bribery Act 2010.

Denbigh Town Council has a zero-tolerance approach to bribery and corruption. This applies to all elected members, employees, volunteers, and any individuals acting on behalf of the Council. Effective measures are in place to prevent bribery in all operations.

Scope of This Policy

This policy applies to:

- All elected members, employees, and volunteers of [Council Name].
- Temporary workers, consultants, contractors, agents, and subsidiaries acting for or on behalf of [Council Name].

All individuals covered by this policy must uphold the highest standards of business conduct. Any breach of this policy is considered a serious disciplinary matter and could result in dismissal for gross misconduct. Additionally, civil or criminal proceedings may be pursued where necessary.

All personnel are required to familiarize themselves with this policy and ensure full compliance.

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Prohibited Actions

Denbigh Town Council strictly prohibits all elected members, employees, and volunteers from:

- Offering, promising, giving, soliciting, or accepting any form of bribe.
 - Giving or receiving cash, gifts, or inducements from any individual or Denbigh Town Council to gain an unfair advantage, whether commercial, contractual, regulatory, or personal.
 - Engaging in activities that could be perceived as attempts to secure improper influence or benefits.
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Record-Keeping

All elected members, employees, and volunteers must maintain accurate and up-to-date records of any corporate hospitality, entertainment, or gifts accepted or offered.

Corporate Hospitality and Promotional Expenditure

Denbigh Town Council permits appropriate and proportionate corporate entertainment, gifts, hospitality, and promotional expenditures if they:

- Establish or maintain legitimate business relationships.
- Enhance the reputation of Denbigh Town Council.

Any proposed expenditure must be reported immediately to the Town Clerk.

Individuals may be required to provide:

- The purpose of the entertainment or expenditure.
- The identities of attendees and the organizations they represent.
- Details and rationale of the proposed activity.

Approval will only be granted if the expenditure serves a clear business objective and does not create a conflict of interest or undue influence.

All gifts, rewards, or entertainment received from clients, suppliers, or business contacts must be reported to the Town Clerk. If there is a real or perceived conflict of interest, individuals may be asked to return the gift or decline the entertainment. Small tokens of appreciation, such as flowers or a bottle of wine, may generally be retained. Employees wishing to provide gifts to suppliers or business contacts must obtain prior approval from the Town Clerk.

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Reporting Suspected Bribery

Denbigh Town Council relies on its elected members, employees, and volunteers to uphold ethical standards and remain vigilant against bribery.

Individuals are encouraged to report any concerns, including:

- Suspected or actual bribery attempts.
- Concerns that a colleague may be receiving or offering bribes.
- Any indications that third parties may be engaging in bribery.

Reports should be made to a line manager or the Town Clerk as soon as possible. All reports will be handled confidentially and investigated promptly. Where necessary, Denbigh Town Council may report matters to the appropriate authorities or the police.

Policy Review

This policy will be reviewed annually to ensure continued compliance with legal and ethical standards.