

Risks, controls and actions - Bribery

as at 25/03/13

Risk Identified	Description	Potential Consequences	Control Measure	Description	Final Impact	Final Likelihood	Final Risk Rating	Further Action Required	Target Date	Owner	Risk Count:
Bribery Act 2010											6
Transaction risk	E.g. charitable or political contributions, licences and permits, and transactions relating to public procurement	Financial implications, reputational damage, adverse publicity, imprisonment, disbarred from public procurement	Standing Orders Financial Regulations Procurement Framework Third Sector commissioning framework Policies reviewed annually Member Code of conduct Employee Code of conduct Code of Corporate Governance Anti Fraud & Anti corruption Framework Anti Money Laundering Policy Whistle Blowing Policy On-Line Training facility	Meritic Fraud & Corruption package updated to incorporate the Bribery Act, Procurement Fraud and Misues & Abuse of Time & Resources on email/internet. Procurement Briefings Briefings delivered to all staff involved in the requisition and purchasing of any good/service within the authority - briefings covered requirements under SOFR and also implications of the Bribery Act. Briefings also covered as part of the corporate induction process.	3	1	3	Training	30/04/12	Turner, Kelvin (Executive Director - Resource & Support Services)	

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Country risk	High level corruption, an absence of effectively implemented anti-bribery legislation and a failure of foreign government, media, local business community and civil society effectively to promote transparent procurement and investment policies	financial implications, reputational damage, adverse publicity, imprisonment, disbarred from public procurement	Standing Orders Financial Regulations Procurement Framework Treasury Management Policy Policies reviewed annually Member Code of conduct Employee Code of conduct Code of Corporate Governance Anti Fraud & Anti corruption Framework Anti Money Laundering Policy Whistle Blowing Policy On-Line Training facility	Meritic Fraud & Corruption package updated to incorporate the Bribery Act, Procurement Fraud and Misues & Abuse of Time & Resources on email/internet. Procurement Briefings Briefings delivered to all staff involved in the requisition and purchasing of any good/service within the authority - briefings covered requirements under SOFR and also implications of the Bribery Act. Briefings also covered as part of the corporate induction process.	3	1	3	Training	30/04/12	Turner, Kelvin (Executive Director - Resource & Support Services)	
Business opportunity risks	High value projects or projects involving many contractors or intermediaries; Projects which are not apparently undertaken at market prices, or do not have a clear legitimate objective	financial implications, reputational damage, adverse publicity, imprisonment, disbarred from public procurement	Procurement Framework Standing Orders Financial Regulations Project Managment based on Prince 2 Review of Project management methodology Member Code of conduct Employee Code of conduct		3	1	3	Training	30/04/12	Turner, Kelvin (Executive Director - Resource & Support Services)	

Risk Identified	Description	Potential Consequences	Control Measure	Description	Final Impact	Final Likelihood	Final Risk Rating	Further Action Required	Target Date	Owner	Risk Count:	
Bribery Act 2010			Code of Corporate Governance Anti Fraud & Anti corruption Framework Anti Money Laundering Policy Whistle Blowing Policy On-Line Training facility	Meritic Fraud & Corruption package updated to incorporate the Bribery Act, Procurement Fraud and Misues & Abuse of Time & Resources on email/internet.							6	
			Procurement Briefings	Briefings delivered to all staff involved in the requisition and purchasing of any good/service within the authority - briefings covered requirements under SOFR and also implications of the Bribery Act. Briefings also covered as part of the corporate induction process.								
Business partnership risks	E.g. use of intermediaries in transactions with foreign public officials; consortia or joint venutre partners; and relationships with polictically exposed persons where the proposed business relationship involves or is linked to, a prominent public official	financial implications, reputational damage, adverse publicity, imprisonment, disbarred from public procurement	Partnership Code of Practice Procurement Framework Standing Orders Financial Regulations Member Code of conduct Employee Code of conduct Anti Fraud & Anti corruption Framework Anti Money Laundering Policy Whistle Blowing Policy Code of Corporate Governance On-Line Training facility	Meritic Fraud & Corruption package updated to incorporate the Bribery Act, Procurement Fraud and Misues & Abuse of Time & Resources on email/internet.	3	1	3	Training	30/04/12	Turner, Kelvin (Executive Director - Resource & Support Services)		

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Bribery Act 2010			Procurement Briefings	Briefings delivered to all staff involved in the requisition and purchasing of any good/service within the authority - briefings covered requirements under SOFR and also implications of the Bribery Act. Briefings also covered as part of the corporate induction process.							6
Internal risks	Lack of clarity in the organisations policies on and procedures for hospitality and promotional expenditure and political or charitable contributions; Deficiencies in employee training, skills and knowledge; Bonus culture that rewards excessive risk taking; Lack of clear financial controls; Lack of clear anti-bribery message from the top-level management	financial implications, reputational damage, adverse publicity, imprisonment, disbarred from public procurement	Member Code of conduct Employee Code of conduct Code of Corporate Governance Financial Regulations Standing Orders Anti Fraud & Anti corruption Framework Anti Money Laundering Policy Whistle Blowing Policy Procurement Framework Partnership Code of Practice Third Sector commissioning framework On-Line Training facility	Meritic Fraud & Corruption package updated to incorporate the Bribery Act, Procurement Fraud and Misues & Abuse of Time & Resources on email/internet. Briefings delivered to all staff involved in the requisition and purchasing of any good/service within the authority - briefings covered requirements under SOFR and also implications of the Bribery Act. Briefings also covered as part of the corporate induction process.	3	1	3	Training	30/04/12	Turner, Kelvin (Executive Director - Resource & Support Services)	

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Bribery Act 2010										
Sectoral risks	Sectors are higher risk than other - higher risk sectors include the extractive industries and the large scale infrastructure sector	financial implications, reputational damage, adverse publicity, imprisonment, disbarred from public procurement	Standing Orders Financial Regulations Procurement Framework Member Code of conduct Employee Code of conduct Code of Corporate Governance Anti Fraud & Anti corruption Framework Anti Money Laundering Policy Whistle Blowing Policy		2	1	2			

Risk Count: 6