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Dear Member

GOVERNANCE AND AUDIT COMMITTEE - TUESDAY, 29 NOVEMBER 2011

I am now able to enclose, for consideration at next Tuesday, 29 November 2011 meeting of the Governance and Audit Committee, the following report(s) that were unavailable when the agenda was printed.

Agenda No	Item
6	<u>Bribery Act Policy</u> (Pages 1 - 18)

Yours sincerely

Peter Sass
Head of Democratic Services

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By: Roger Gough – Cabinet Member for Business Strategy,
Performance and Health Reform
Geoff Wild – Director of Governance and Law
To: Governance and Audit Committee – 29th November 2011
Subject: BRIBERY ACT POLICY
Classification: Unrestricted

Summary: This report provides the Governance and Audit Committee the opportunity to review the Bribery Act Policy and associated amendments to the Council's constitution.

FOR DECISION

Introduction and Background

1. The Bribery Act 2010 came into force on the 1st July 2011. The Act modernises the law on bribery. The Act represents a significant change from the current law and places obligations on the Council to ensure that it has adequate procedures in place. The Committee were provided a full briefing at the previous Governance and Audit Committee.

Bribery Act Policy

2. The Bribery Act Policy has been prepared to ensure the Council complies with the Act. The policy explains the process through which the Council intends to maintain its high standards and protect its employees, Members and business partners against any allegations of bribery and corruption.

Amendments to the Constitution

3. With the introduction of the Bribery Act 2010 and the associated policy it is appropriate that the Council's constitution be amended. The changes suggested are minor and reflect the need for employees and Members to adhere to the Council's policy.
4. The Standards Committee considered this report at its meeting on 17 November 2011 and agreed to recommend it to the County Council for adoption subject to any amendments this Committee may make.

Recommendations

5. Members of the committee are asked to:
 - Recommend to the County Council that, together with the consequential changes to the constitution, the Bribery Act Policy be approved.

Geoff Wild
Director of Governance and Law
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KENT COUNTY COUNCIL

BRIBERY ACT POLICY

As approved by:

Standards Committee – 17 November 2011

Selection & Member Services Committee – 18 November 2011

County Council – 15 December 2011

Introduction

1. This policy is introduced to ensure compliance with the Bribery Act 2010. It explains the process through which the Council intends to maintain high standards and to protect the organisation, employees, Members and business partners against allegations of bribery and corruption.
2. It is the Council's policy to conduct business in an honest and open way, and without the use of corrupt practices or acts of bribery to obtain an unfair advantage. The Council attaches the utmost importance to this policy and will apply a "zero tolerance" approach to acts of bribery and corruption by any of its Members, employees, or persons and partners acting on our behalf. Any breach of this policy will be regarded as a serious matter and is likely to result in disciplinary action and possibly criminal prosecution.

Policy Statement

3. Bribery is a criminal offence. The Council will not pay bribes, or offer improper inducements to anyone for any purpose, nor will the Council accept bribes or improper inducements. The use of a third party to channel bribes is also a criminal offence. The Council will not engage indirectly in or otherwise encourage bribery.
4. The Council is committed to ensuring compliance with the highest legal and ethical standards. The Council will commit to policies and procedures to prevent, deter, and detect acts of bribery. The Council will ensure that anti-bribery compliance is an essential aspect of its governance process and at the core of its business principles. It is an on-going process and not a one-off exercise.

Objective

5. This policy presents a clear and precise framework to understand and implement the arrangements required to comply with the Bribery Act 2010. It provides the context for the detailed rules, procedures and controls in place. It should provide no room for misinterpretation and will ensure that Members, employees, volunteers and business partners know what is expected of them in preventing bribery.
6. This policy should be read in conjunction with, and reinforce, other related policies and documents (see paragraph 27). The provisions in these policies and documents should be reflected in every aspect of the way the Council operates. The requirement to act honestly and with integrity at all times is made clear and is fundamental and non-negotiable.
7. This policy explains the procedures established to prevent acts of bribery and allow any breach to be identified and reported.

Scope

8. This policy applies to all of the Council's activities. The Council requires that all Members (including independent and co-opted Members), employees at all levels and grades, temporary and agency staff, volunteers, contractors, agents, consultants and partners acting on the Council's behalf, comply with the provisions of this policy. The Council will also seek to promote the adoption of reciprocal anti-bribery and corruption measures that are consistent with the Council's policy by joint venture partners and major suppliers.
9. The responsibility to mitigate the risk of bribery resides at all levels of the Council and includes all directorates. It does not rely solely on the Council's assurance functions.

Policy Commitment

10. The Council commits to:
 - setting out a clear anti-bribery policy and keeping this up-to-date with regular reviews
 - making all Members, employees and partners aware of their responsibilities to adhere to this policy at all times
 - providing training, where appropriate, to allow Members, employees and partners to recognise and avoid the use of bribery by themselves or others
 - encouraging Members, employees and partners to be vigilant and to report any suspicions of bribery
 - providing suitable channels of communication (e.g. Whistleblowing Procedure) to ensure that sensitive information is handled appropriately
 - investigating instances of alleged bribery and assisting the police and other authorities in any prosecution
 - taking action against anybody acting for or on behalf of the Council who is involved in bribery
 - reporting breaches and suspected breaches of this policy to Members, employees and partners in an open and transparent way and
 - including appropriate clauses in contracts with suppliers to advise on the Council's approach to the provisions of the Bribery Act 2010

The Bribery Act 2010

11. The Bribery Act 2010 was introduced to update and enhance English law on bribery. It creates a strict liability corporate criminal offence of failing to prevent bribery. The only defence against this corporate offence is for organisations to have adequate procedures in place to prevent bribery.

12. The Act includes four offences:

- Bribing a person to induce or reward them to perform a relevant function improperly
- Requesting, accepting or receiving a bribe as a reward for performing a relevant function improperly
- Using a bribe to influence a foreign official to gain a business advantage and
- In relation to a commercial organisation committing bribery to gain or retain a business advantage, there being no adequate procedures in place to prevent such actions

13. Acts of bribery are intended to influence an individual or organisation in the performance of their duty and for them to act illegally.

14. The penalties under the Bribery Act have been raised significantly and are severe. The new corporate offence is punishable with an unlimited fine. An individual guilty of an offence may be liable to imprisonment for up to 10 years or to a fine, or to both.

15. The Council accepts that public bodies may be classed as a “commercial organisation” in relation to the corporate offence of failing to prevent bribery. In any event, it represents good governance and practice to have adequate procedures in place to protect the Council, Members, employees and partners from reputational and legal damage. It is in the interests of everybody connected to the Council to act with propriety at all times.

Council Procedures on the Bribery Act

14. The Council will follow the guidance issued by the Ministry of Justice. The actions are intended to be proportionate to the risks faced by the Council and to the nature, scale and complexity of the Council’s activities. The actions are expected to provide a defence of “adequate procedures” against any corporate offence. The following steps will be taken:

- **Top Level Commitment** – The Corporate Management Team is committed to preventing bribery by persons associated with the Council. A report on the Bribery Act 2010 and the introduction of this policy has been approved by the Corporate Management Team (on 23 August 2011) and the Governance and Audit Committee (on 14 September 2011).
- **Risk Assessment** – The nature and extent of the Council’s exposure to external and internal risks of bribery will be assessed as part of the Council’s risk management process. Any risk assessment is intended to be an on-going process based on regular communication and review.
- **Due Diligence** – A proportionate and risk based approach will be taken in respect of persons and other organisations that perform services for or on behalf of the Council. Due diligence will include an evaluation of the

background, experience and reputation of business partners. The transactions will be properly monitored and written agreements and contracts will provide references to the Bribery Act 2010 and this policy. Reciprocal arrangements may be required for business partners to have their own policies in place. They will be advised of the Council's policy and be expected to operate at all times in accordance with such policy.

- **Communication** – The Council will ensure that this policy and other related policies and procedures are embedded in the Council's working arrangements through appropriate communication, including training, which is proportionate to the risks the Council faces. The Council's induction programme will include reference to the Bribery Act 2010 and this policy.
- **Monitoring and Review** – This policy, control arrangements, risk management processes and other related policies and procedures designed to prevent bribery and corruption will be monitored, reviewed and improved where necessary on a regular basis. All incidents of bribery or suspected bribery will be reported to the Governance and Audit Committee. An assurance of compliance will be included in the Annual Governance Statement.

15. In the context of this policy it is unacceptable for persons acting for or on behalf of the Council to:

- Give, promise to give, or offer a payment, gift or hospitality with the expectation or hope that a business advantage will be received, or to reward a business advantage already given
- give, promise to give, or offer a payment, gift or hospitality to a government official, agent or representative to facilitate or expedite a routine procedure
- accept payment from a third party that is known to be, or suspected to have been, offered with the expectation that it will obtain a business advantage for them
- accept a gift or hospitality from a third party if it is known to be, or suspected to have been, offered with an expectation that a business advantage will be provided by the Council in return
- retaliate against or threaten a person who has refused to commit an act of bribery or who has raised concerns under this policy and
- engage in any activity in breach of this policy

Gifts and Hospitality

16. This policy is not intended to change the requirements of the Council's Gifts and Hospitality policies and procedures. This is contained in the Kent Code and in the Members Code of Conduct in the Council's Constitution.

17. The guidelines clearly set out the restrictions on accepting gifts and hospitality, the need to inform the manager and the need to register any approved gifts that are retained.
18. If there is any doubt about whether an invitation or gift should be accepted then the offer should be refused. Each Corporate Director is required to review their respective Gifts and Hospitality registers at least annually. The Corporate Director of Finance and Procurement will ensure that reminders on this subject and the need for officers to complete a Register of Interests form are sent out every year.
19. The procedures for Members' registers of interest are set out in the Members' Code of Conduct.

Public Contracts

20. Under the Public Contracts Regulations 2006 (which gives effect to EU law in the UK) a company is automatically and perpetually debarred from competing for public contracts where it is convicted of a corruption offence. It is understood that there are no plans to amend the 2006 regulations for these to include the crime of failure to prevent bribery. Organisations that are convicted of failing to prevent bribery are not automatically barred from participating in tenders for public contracts. The Council will use its discretion as to whether to exclude organisations convicted of this offence and any instances where this is the case will be reported to the Corporate Management Team for a decision.

Member, staff and partner Responsibilities

21. The prevention, detection and reporting of bribery and other forms of corruption are the responsibility of all those working for the Council or acting for or on its behalf. All Members, staff, volunteers and partners are required to avoid activity that breaches this policy. Adherence to the policy is mandatory.
22. Members, staff, volunteers and partners must:
 - Ensure that they have read, understood and comply with the Bribery Act Policy and
 - raise concerns as soon as possible if they believe or suspect that a conflict with this policy has occurred, or may occur in the future
23. In addition to the possibility of criminal prosecution, members of staff who breach the policy will face disciplinary action, which could result in dismissal for gross misconduct.

Raising a concern

24. Staff are encouraged to raise any concerns with their manager. In addition, the Council has published a Whistleblowing Procedure. This provides information on the courses of action available to report serious concerns

(including bribery) in confidence. Members, staff or partners who refuse to accept the offer of a bribe may worry about the repercussions. The Council aims to encourage openness and will support anyone who raises a genuine concern in good faith under this policy, even if they turn out to be mistaken.

25. The Council is committed to ensuring that nobody suffers detrimental treatment through refusing to take part in bribery.

Review of the Bribery Act Policy

26. It is the responsibility of the Corporate Director of Finance and Procurement to routinely refresh, review and reinforce this policy and its underlying principles and guidelines. All members of staff are responsible for reading and understanding this policy which will also form part of the induction programme.

Other relevant policies

27. The following policies, procedure documents and codes of conduct should be read in conjunction with the Bribery Act Policy:

- Constitution
- Anti-Fraud and Corruption Policy
- Anti-Money Laundering Policy
- Whistleblowing Procedure
- Kent Code
- Disciplinary Procedure
- Members Code of Conduct
- Spending the Council's Money

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Constitution – Bribery Act Amendments

1. Pg 30 – Corporate Governance Committee

Add (j) The Council implements the Bribery Act Policy and ensures that it is followed at all times

Corporate Governance Committees

1. Governance and Audit Committee

13 Members

Conservative: 12; Liberal Democrat: 1.

The purpose of this Committee is to:

1. ensure the Council's financial affairs are properly and efficiently conducted and
2. review assurance as to the adequacy of the risk management and governance framework and the associated control environment.

On behalf of the Council this Committee will ensure the following outcomes:

- (a) Risk Management and Internal Control systems are in place that are adequate for purpose and effectively and efficiently operated.
- (b) The Council's Corporate Governance framework meets recommended practice (currently set out in the CIPFA/SOLACE Good Governance Framework), is embedded across the whole Council and is operating throughout the year with no significant lapses.
- (c) The Council's Internal Audit function is independent of the activities it audits, is effective, has sufficient experience and expertise and the scope of the work to be carried out is appropriate.
- (d) The appointment and remuneration of External Auditors is approved in accordance with relevant legislation and guidance, and the function is independent and objective.
- (e) The External Audit process is effective, taking into account relevant professional and regulatory requirements, and is undertaken in liaison with Internal Audit.
- (f) The Council's financial statements (including the Pension Fund Accounts) comply with relevant legislation and guidance and the associated financial reporting processes are effective.
- (g) Any public statements in relation to the Council's financial performance are accurate and the financial judgements contained within those statements are sound.
- (h) Accounting policies are appropriately applied across the Council.
- (i) The Council has a robust counter-fraud culture backed by well designed and implemented controls and procedures which define the roles of management and Internal Audit.
- (j) The Council implements the Bribery Act Policy and ensures that it is followed at all times

2. Pg 129 – Appendix 5 Resource Management Responsibilities Statement

Add 1.2 “Financial Regulations, the Anti-Fraud Strategy, the Bribery Act Policy and...”

Appendix 5: Resource Management Responsibilities Statement (including Property Management Protocol and Contracts and Tenders Standing Orders)

Introduction

1.1 This Appendix sets out the responsibilities for bodies and office holders within the Council structure for ensuring that the Council’s resources are used in accordance with the principles of sound financial management, proper exercise of responsibility and accountability.

1.2 Financial Regulations, the Anti-Fraud Strategy, the Bribery Act Policy and Codes of Practice giving effect to these principles are prepared and maintained by the Chief Finance Officer and Managing Director and endorsed by the Leader and Governance & Audit Committee.

3. Pg 131 – The Governance and Audit Committee

Add (m) overseeing the operation of the Bribery Act Policy

1.8 **The Governance & Audit Committee** is responsible for:

- (a) monitoring the Council’s compliance with its own published standards and controls and with other standards and considering any proposals for changes to Financial Regulations and the Code of Practice on Contracts and Tenders
 - (b) liaising with the Audit Commission over the appointment of the Council’s external auditor
 - (c) discussing with the external auditor and Cabinet the basis of the annual audit, including the overall level and composition of the fee and the content of performance work
 - (d) receiving all reports by the external auditor including all performance reports and the Annual Management Letter
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- (e) overseeing the Internal Audit activity of the Council
 - (f) considering and responding to reports from the external auditor and Audit Commission Inspectorate
 - (g) monitoring the response of the Cabinet and Council Committees to audit reviews and investigations and the implementation of agreed recommendations
 - (h) overseeing the operation of the Council’s complaints procedures,

including the response of the Cabinet or a Council Committee to any report by the Local Government Ombudsman

(i) approving the annual accounts on behalf of the Council

(j) approving the writing-off of debts from the Council's accounts (except those agreed by the Chief Finance Officer as provided for in the Financial Regulations)

(k) monitoring the operation of borrowing and investment policies and Treasury Management activity and

(l) agreeing the risk management policy with the Cabinet and monitoring insurance arrangements

(m) overseeing the operation of the Bribery Act Policy

4. Pg 133 – The Chief Finance Officer

Add (q) the review and updating of Spending the Council's Money, the Risk Register, the Anti-Fraud & Corruption Statement of Policy and Council Insurance to reflect the requirements of the Bribery Act Policy

1.12 **The Chief Finance Officer** is responsible for:

(a) after consulting with the Managing Director and the Monitoring Officer, reporting to the full Council (or to the Leader or Cabinet in relation to an executive function) and the Council's external auditor if he considers that any proposal, decision or course of action will involve incurring unlawful expenditure, or is unlawful and is likely to cause a loss or deficiency, or if the Council is about to enter an item of account unlawfully

(b) the proper administration of the financial affairs of the Council

(c) maintaining an adequate and effective internal audit

(d) contributing to the corporate management of the Council, in particular through the provision of professional financial advice

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(e) providing advice on the scope of powers and authority to take decisions, maladministration, financial impropriety, probity and Budget and Policy Framework issues to all Members and supporting and advising Members and officers in their respective roles and

(f) providing financial information about the Council to Members of the Council, the media, members of the public and the community and in particular for

(g) setting financial management standards, including financial procedures, and monitoring their compliance

(h) advising on the corporate financial position and on the key financial controls necessary to secure sound financial and risk management

(i) providing financial information to support the proper financial planning of the authority, to inform policy development and to assist Members and officers in undertaking their financial responsibilities

(j) preparing the revenue budget and reporting to the Council, when considering the Budget and Council Tax, on the robustness of the estimates and the adequacy of reserves

- (k) monitoring income and expenditure against the budget and taking action if overspends or shortfalls in income emerge
- (l) preparing the capital programme and ensuring effective forward planning and sound financial management in its compilation
- (m) treasury management
- (n) making recommendations to the Leader and Council on the prudential indicators and advising on all other matters required to be considered by the Prudential Code for Capital Finance
- (o) the Council's banking arrangements and
- (p) issuing advice and guidance to underpin the Financial Regulations that Members, officers and others acting on behalf of the authority are required to follow
- (q) the review and updating of Spending the Council's Money, the Anti-Fraud & Corruption Statement of Policy and Council Insurance to reflect the requirements of the Bribery Act Policy

5. Pg 134 – The Managing Director and Senior Managers

Add (m) ensuring that the Bribery Act Policy is implemented, promoted and complied with in line with the agreed Policy

1.15 The Managing Director and Senior Managers are responsible for:

- (a) ensuring that the Leader or relevant Cabinet Member is advised of the financial implications of all proposals for changes in services or the development of new services and that the financial implications have been agreed by the Chief Finance Officer
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- (b) promoting the financial management standards set by the Chief Finance Officer in their Directorates and monitoring adherence to standards and practices, liaising as necessary with the Chief Finance Officer
 - (c) the signing of contracts on behalf of the Council provided that the expenditure incurred has the necessary budget approval
 - (d) promoting sound financial practices in relation to standards, performance and development of staff in their Directorates
 - (e) consulting with the Chief Finance Officer and seeking his approval regarding any matters which are liable to materially affect the Council's finances, before any commitments are incurred
 - (f) ensuring that all staff in their Directorates are aware of the existence and content of the authority's Financial Regulations and any related procedures and other internal regulatory documents appertaining to or amplifying them and that they comply with them; they must also ensure that all of these documents are readily available for reference within their Directorates
 - (g) managing service delivery within the agreed revenue and capital budgets and other relevant strategies and plans
 - (h) developing performance, corporate and service targets
 - (i) ensuring that budget estimates reflecting agreed service plans are prepared in line with issued guidance
 - (j) ensuring that financial management arrangements and practice are agreed with the Chief Finance Officer, are legal and consistent with best

practice and Council policy

(k) consulting with the Chief Finance Officer on the financial implications of matters relating to policy development and

(l) putting in place a scheme of financial delegation setting out arrangements for the discharge of the Senior Manager responsibilities contained within Financial Regulations

(m) ensuring that the Bribery Act Policy is implemented, promoted and complied with in line with the agreed Policy

6. Pg 134 – Principles of Decision Making

Add “... and risk management issues, including the Bribery Act Policy, which may arise ...”

Principles of Decision Making

1.16 All Members and officers taking decisions whether on behalf of the Council or the Leader must act in accordance with the Council’s agreed principles of decision making (Article 12.2) and take account of legal and financial liabilities and risk management issues, including the Bribery Act Policy, which may arise from the decision.

7. Pg 135 – Contracts and Tenders Standing Orders

Add new (g) the Council’s Bribery Act Policy

Contracts and Tenders Standing Orders

1. It is the responsibility of the Managing Director and Senior Managers to ensure that all purchases of goods and services comply with:

(a) legal requirements

(b) EU Directives

(c) the Council’s Financial Regulations

(d) the Code contained in ‘Spending The Council’s Money’ (as approved by the Governance & Audit Committee)

(e) standards for the management of property, information technology resources and staff and

(f) any conditions attached by the Leader or the Council to the exercise of powers delegated by them

(g) the Council’s Bribery Act Policy

8. Pg 147 – Appendix 6 Part 1: Code of Member Conduct

Add Para 6 (4) must have regard to the Council’s Bribery Act Policy which applies to you, officers and any other person or organisation with whom you are dealing

6. You:

(1) must not use or attempt to use your position as a member improperly to confer on or secure for yourself or any other person, an advantage or disadvantage; and

(2) must, when using or authorising the use by others of the resources of the County Council:

(a) act in accordance with the County Council's reasonable requirements;

- (b) ensure that such resources are not used improperly for political purposes (including party political purposes); and
- (3) must have regard to any applicable Local Authority Code of Publicity made under the Local Government Act 1986.
- (4) must have regard to the Council's Bribery Act Policy which applies to you, officers and any other person or organisation with whom you are dealing

9. Pg 166 – L Gifts and Hospitality

L. Gifts and Hospitality

1. In accordance with the Bribery Act Policy, you must not accept significant personal gifts from contractors, clients or outside suppliers as this could compromise both you personally and KCC as an organisation. It is a serious criminal offence to receive or give any gift, loan, fee, reward or advantage to anyone in your capacity as a KCC employee. Minor articles, e.g. diaries, calendars, office items and the like, are unlikely to be regarded as a gift but if there is any doubt, a gift should be refused.
2. If you receive unsolicited gifts, they must be returned with a polite refusal letter to the sender. You should also inform your manager, so it can be clearly recorded in the Directorate/Service Unit Register of Hospitality/Gifts.
3. You may not accept legacies from clients or others who may have benefited from your services delivered on behalf of KCC. If you are named as a beneficiary, you should immediately inform your manager.
4. You should only accept offers of hospitality if there is a genuine need to impart information or represent KCC in the community and where you are satisfied that any decisions are not and will not be compromised. Offers to attend purely social or sporting functions should be accepted only when these are part of the life of the community or where KCC should be seen to be represented. They should be properly authorised by your line manager and recorded in advance of the event in the Directorate's Hospitality/Gifts Register.
5. KCC should meet the costs of all visits to reference sites, supplier's premises etc. to avoid jeopardising the integrity of any subsequent decisions.
6. When hospitality has to be refused, the invitation should still be recorded in the Directorate's Register of Hospitality/Gifts.
7. Many supermarkets, petrol stations and high street stores offer loyalty cards for customers as an incentive to purchase from them. There are various types of loyalty cards, which offer a variety of rewards or bonuses, and it is likely you will have at least one of these cards for your personal use. You should not use your personal loyalty cards when purchasing goods or services on behalf of KCC or its clients. The use of such cards may compromise your professional integrity, particularly if the retail outlet or supplier was chosen because they offer you additional reward and not because it provided the greatest benefit and cost effectiveness to KCC or its clients.
8. Likewise, many credit card companies offer loyalty rewards. The use of personal credit cards to purchase goods or services on behalf of KCC or its clients should be avoided unless no other means of expenditure is available.
9. However, should any loyalty rewards be received whilst undertaking KCC business where there is no means of these being transferred to KCC, then they can be regarded as the property of the individual employee, e.g. frequent traveller programmes, hotel loyalty awards, etc.

10 Pg 167 – M Sponsorship – Giving and Receiving

M. Sponsorship - Giving and Receiving

1. Where an outside organisation wishes to sponsor a KCC activity, whether by invitation, tender, negotiation or voluntarily or in response to an approach by KCC to potential sponsors, you should:
 - a. refer, at the earliest possible stage, to the Bribery Act Policy and the Sponsorship Policy & Guidance generally and the section on procurement in particular
 - b. follow the basic conventions concerning the acceptance of gifts or hospitality and record these arrangements in the Directorate's Register of Hospitality & Gifts.
2. Where the value of sponsorship arrangements exceeds the relevant threshold in the Public Contracts Regulations 2006, (the Regulations), or involve payment in kind by the sponsor they must be advertised and tendered in line with the Regulations.
3. Where KCC wishes to sponsor an event or service, neither you nor your partner, spouse, close friend or relative must benefit from such sponsorship. Similarly, where KCC, through sponsorship, grant aid, financial or other means, gives support in the community, you should ensure impartial advice is given and there is no conflict of interest involved.
4. Enquiries about seeking or accepting sponsorship for KCC should be directed to the Kent External Funding Team.

11 Pg 168 – RELATED PROCEDURES, POLICIES, GUIDELINES AND SUPPORT

RELATED PROCEDURES, POLICIES, GUIDELINES AND SUPPORT

The following can be found in the people management handbook, the 'Blue Book' (Kent Scheme Terms and Conditions of Employment) and on KNet.

- * Drugs & Alcohol Policy
- * Equality & Diversity Policy
- * Stress Management Policy
- * KCC's Financial Regulations
- * Anti-Fraud & Corruption Statement of Policy
- * Electronic Communications Use Policy (ECUP)
- * Responsible User Guidance (RUG)
- * Whistleblowing Policy
- * Virus Protection Policy
- * Smoking Policy
- * Managers' Guidance on Employment References
- * Health & Safety at Work Policy and Guidance
- * Health & Safety Framework
- * Harassment Procedure
- * Guidance on Foreign Travel
- * Spending the Council's Money
- Bribery Act Policy

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