

# GLA36/10.6 Bribery Policy

17 January 2013

**BOARD PAPER REFERENCE – GLA36/10.6 – BRIBERY POLICY**Issue

1. The recent internal audit of the GLA's compliance with the Bribery Act 2010 recommended that Board members should be included in the GLA's Anti-Bribery policy.

Recommendations

2. To agree the Anti-Bribery policy for Board Members which is attached to this paper.
3. All Board members to return a signed copy of the policy on an annual basis.

Background

4. The Bribery Act 2010 came into force from 1 July 2011.
5. The GLA is committed to the highest standards of ethical conduct and integrity in its business activities. This policy for GLA Board members outlines the GLA's position on preventing and prohibiting bribery, in accordance with the Bribery Act 2010. The GLA will not tolerate any form of bribery by, or of its Board members, employees, agents or consultants or any person or body acting on its behalf.

Policy

6. The policy will apply to all Board members and governs conduct when acting in the capacity of a Board member. It is recognised that individual board members will have their own procedures and policies for dealing with the requirements of the Bribery Act in relation to their own business or employment.
7. Any breach of this policy may constitute a serious matter (including a criminal matter) for the individual concerned and may cause serious damage to the reputation and standing of the GLA.
8. This policy should be read in conjunction with the *Code of Conduct for Board Members of Public Bodies* published by the Cabinet Office. This can be downloaded here [http://resources.civilservice.gov.uk/wp-content/uploads/2011/09/code-of-conduct\\_tcm6-38901.pdf](http://resources.civilservice.gov.uk/wp-content/uploads/2011/09/code-of-conduct_tcm6-38901.pdf)
9. The policy covers:
  - The main areas of liability under the Bribery Act 2010
  - The responsibilities of employees and associated persons acting for, or on behalf of the GLA; and
  - The consequences of any breaches of this policy
10. To avoid possible breaches of the policy, Board members, when acting in their capacity as a Board member must not offer or accept any corporate

entertainment, gifts or hospitality. The policy provides guidance on how to deal with offers of hospitality.

11. The internal auditors recommended that the policy should be signed by Board members on an annual basis. Board members will be expected to sign the policy in January of each calendar year to ensure ongoing familiarity with the policy. Any amendments to the policy will be brought to the Board for discussion.