



SUPPLIER CODE OF CONDUCT

Daventry District Council has a zero-tolerance approach to fraud, bribery and corruption and has a number of policies in place which outline the standards expected of employees and the action which will be taken when these standards are breached. Suppliers and contractors are an extension of the Council, delivering a public service, paid for by public money through the procurement process. Taxpayers, therefore, have an expectation that suppliers and contractors will look after the Council's interests and deliver on the promises they make.

We hope and expect that you will work with us to help build the trust of the public by creating a culture that promotes high standards and deters or exposes fraud, bribery and corruption.

FRAUD

Fraud can range from small, one-off occurrences through to serious organised crime. The Fraud Act 2006 provides set definitions for classifying fraud: it involves abuse of a position, failing to disclose information or falsely representing a situation.

Although fraud against local authorities is commonly perceived as a victimless crime, it can have a substantial impact on residents, businesses and vulnerable individuals within the local area. Losses attributable to fraud reduce the Council's financial capacity to provide services and may have a dramatic impact on the wellbeing of residents within the community. Even a minor case of fraud could damage the Council's reputation.

Working with us

You will act with integrity and honesty by only submitting legitimate invoices and claiming for work that is complete and due for payment. You will also have robust processes in place to ensure that the subcontractors in their supply chain also comply with the law. We have zero tolerance of any form of corrupt practices including extortion and fraud and you will be vigilant and proactively look for fraud, and the risk of fraud, in their business. You will immediately notify us where fraudulent practice is suspected or uncovered and disclose any conflicting interests that might impact their decision-making or the advice that they give.

BRIBERY AND CORRUPTION

Bribery can be described as requesting, receiving or agreeing to an inducement for an action which is illegal, unethical or in breach of trust. Inducements can take the form of gifts, fees, rewards or other advantages such as retaining business. For example, a member of your staff is keen to gain a success record within your company and approaches a member of our staff with a proposal to "hurry things along" in return for a sum of money.

Corruption occurs when people use their position or powers to influence decisions or policies or allocate funds in ways they are not supposed to, in order to make a gain for themselves or for someone else. It can include cartels, bribery and embezzlement. For example, you have been invited to tender for a big project which promises to be a keenly fought contest. One of our senior managers hints that he can help you win the tender if you reach an "agreement" with him.

Working with us

You will refuse to offer, give or receive bribes or improper payments, or participate in any kind of corrupt activity either directly or through any third party. You will tell us about any attempt to bribe you or solicit bribes from you and any suspicions you have about bribery and corruption. You will ensure your staff receive bribery and corruption training and are aware of the implications it could have on them and your business.

CONFLICTS OF INTEREST

Employees of the Council are not allowed to use their official position, status, powers or authority to improperly influence a decision or action. At all times they are expected to be impartial.

If a member of your firm has a close relative within the Council department making a decision to procure from you, they are required to declare this to their line management who will then ensure Council decision-making is not compromised. This does not mean you cannot quote for work, but your relative will not be the decision-maker.

GIFTS AND HOSPITALITY

Although the offer of a gift or hospitality may be entirely without expectation of gain, it is important that the Council avoids any suggestion of improper influence. To safeguard employees and the Council, we have clear rules in place outlining how the offer of gifts and hospitality should be handled.

Employees should not accept personal gifts from contractors or suppliers although items of token value such as pens, diaries or calendars may be retained for use in Council premises.

Offers of hospitality should not be accepted unless there is a genuine business need to exchange information or represent the Council. For example acceptance of hospitality through attendance at conferences and courses is acceptable where it is clear that the hospitality is corporate not personal and where it is clear there is an explicit business purpose.

Employees know to be particularly sensitive to the timing of offers of hospitality, for example hospitality must not be accepted knowingly from interested parties during the tendering period of a contract, or whilst an application for planning permission or some other kind of permission or decision is being considered by the Council.

Working with us

You will be aware of the restrictions in place for employees regarding gifts and hospitality and ensure that Council employees are not put in awkward positions in relation to gifts or hospitality.

You will always tell us about any attempt or pressure from an employee to provide them with gifts or hospitality. You will notify us of any firms for which you act as a sub-contractor that reports any such behaviour or gift to a Council employee.

CORPORATE CRIMINAL OFFENCE

The Criminal Finances Act 2017 introduced two corporate offences, one relating to the evasion of UK tax and one relating to the evasion of foreign tax. An offence could be committed if, for example, a Council employee conspired with a supplier to falsify the amount paid on an invoice so that the supplier evaded paying income or corporate taxes. The Council could be charged with the offence unless it can prove it had reasonable procedures in place to prevent facilitation.

Working with us

You will only submit accurate invoices. You will take particular care when submitting invoices to ensure you comply fully with your tax obligations.

HOW TO RAISE CONCERNS

The Council encourages all contractors and suppliers to raise genuine concerns about any aspect of service provision, the conduct of employees / Members of the Council or others acting on behalf of the Council.

Allegations or suspicions should be reported to any of the following:

- Chief Executive
- Monitoring Officer
- Chief Financial Officer
- Internal Audit Manager

All concerns will be treated in confidence and every effort will be made to keep the identity of the person raising the concern unknown. At the appropriate time, however, you may need to come forward as a witness.

You may raise concerns anonymously, however it must be recognised that anonymous allegations are much less powerful and more difficult for the Council to act upon.

HOW WILL THE COUNCIL RESPOND?

The Council's Monitoring Officer deals with initial enquiries to establish whether there are reasonable grounds for the concerns raised. The information obtained is reviewed and, where necessary, an appropriate employee will be assigned to investigate the concern. Investigations are conducted in accordance with the Council's Anti-Fraud, Bribery and Corruption Response Plan. Some allegations may be better dealt with as management issues and, where appropriate, management will proceed with reference to the Council's disciplinary procedures if it involves staff.

Any allegation of fraud, bribery or corruption purported to be committed by Councillors or Co-opted members of committees may, if appropriate, be considered by the Monitoring Officer against the Local Code of Conduct for Members, under its separate complaints handling arrangements.

FURTHER INFORMATION

The Council has a framework of counter fraud documents including an Anti-Fraud, Bribery and Corruption Policy, Confidential Reporting Policy and Anti-Money Laundering Policy. These are available on the Council's website. Alternatively, contact the Council's Corporate Fraud Officer on (01327) 871100.