

Integrated Impact Assessment – Summary Report

Each of the numbered sections below must be completed
Please state if the IIA is interim or final

1. Title of proposal

Review of the Anti-Bribery Policy and supporting procedure

2. What will change as a result of this proposal?

Policy:

- The policy will now be on the new templates and align with all other colleague policies
- The roles and responsibilities outlined in the existing Anti-Bribery Procedure will be brought into the Policy to highlight the obligations on all colleagues, managers and elected members.
- Links to relevant policies will now be included.

Procedure:

- The procedure has been updated with the current risk management approach within the Council.
- The current approach means that the Council's Risk Management Team will support colleagues in the continuous identification and management of anti-bribery risks through training, risk workshops and risk reporting/escalation.

3. Briefly describe public involvement in this proposal to date and planned

This is colleague policy for internal Council use however engagement has taken place with relevant colleagues.

4. Is the proposal considered strategic under the Fairer Scotland Duty?

No, this revised employment policy does not directly tackle socio-economic disadvantage or reduce the inequalities that are associated with being disadvantaged however we do recognise within this IIA, the positive benefits that this policy will bring to contributing to the Council's duty under the FSD

5. Date of IIA

18 December 2024

6. Who was present at the IIA? Identify facilitator, lead officer, report writer and any employee representative present and main stakeholder (e.g. Council, NHS)

Name	Job Title	Date of IIA training
Kate Morton (Facilitator)	Senior HR Consultant	03/10/2024
Emma Kilpatrick (Lead Officer)	Lead HR Consultant	18/05/2022
Stefanie Thomson	Senior Solicitor	
Michelle McMillan	Chief Risk Officer	September 2019
Richard Thrall	Governance Officer	7/11/2019
Neil Fraser	Commercial and Procurement Services Delivery Manager	N/A
Vanessa Anderson	HR Consultant	22/05/2022

7. Evidence available at the time of the IIA

Evidence	Available – detail source	Comments: what does the evidence tell you with regard to different groups who may be affected and to the environmental impacts of your proposal
Data on populations in need – where available use disaggregated data	Colleague data from Oracle	Information on colleague demographics highlight that within GR1-GR10, the balance is in favour of females, while GR11-CO is in favour of males.
Data on service uptake/access	Data from Halo on cases	There is no evidence of founded Anti-Bribery allegations / cases within the Council in the last 5 years.
Data on socio-economic disadvantage e.g. low income, low wealth, material deprivation, area deprivation	N/A	
Data on equality outcomes	N/A	
Research/literature evidence	Information and bribery case studies were consolidated into a supporting document and provided to attendees in advance	Evidence highlights that within Local Government bribery within procurement processes is more likely to be fraud or corruption within the processes. The examples provided also included corruption in the Planning permission process rather than procurement. It also highlighted that the risk is higher where discretionary decision making was permitted, especially within the Construction sector.
Public/patient/client experience information	N/A	
Evidence of inclusive engagement of people who use the service and involvement findings	N/A	
Evidence of unmet need	N/A	

Evidence	Available – detail source	Comments: what does the evidence tell you with regard to different groups who may be affected and to the environmental impacts of your proposal
Good practice guidelines	Anti-Bribery Act 2010 Anti-Bribery Gov Guidance CEC Risk Management Policy and Framework	<p>Both documents outline the expected standards within an organisation and what organisations can do to mitigate the risk of bribery.</p> <p>Our risk management policy helps delivery of the business plan and services by identifying, assessing and managing risks. The risk management framework helps our teams apply the risk management policy and Risk Appetite statement when delivering services and making decisions.</p>
Carbon emissions generated/reduced data	N/A	
Environmental data	N/A	
Risk from cumulative impacts	N/A	
Other (please specify)	N/A	
Additional evidence required	N/A	

8. In summary, what impacts were identified and which groups will they affect?

Equality, Health and Wellbeing and Human Rights and Children’s Rights	Affected populations
<p>Positive</p> <p>By outlining specific obligations for everyone, means they will have a clear understanding of their duties in identifying and preventing bribery.</p> <p>The introduction of risk management training and workshops will raise awareness of bribery within the Council and better</p>	<p>All colleagues and Elected Members</p> <p>All colleagues</p>

Equality, Health and Wellbeing and Human Rights and Children’s Rights	Affected populations
<p>protect colleagues in the work and empower them to act when they see wrongdoing. Better awareness raising to all colleagues, and where appropriate targeted communications will protect those most susceptible to bribery.</p> <p>Moving the policy to the new template and the use of plain English enhances accessibility, making it easier for colleagues to understand and engage with the content of the policy.</p> <p>Having a clear anti-bribery policy in place could help raise awareness among the business community within Edinburgh about the Council’s practice. This awareness can empower businesses to recognise and mitigate situations where they might be asked for bribes.</p> <p>Colleagues are given control over their decisions and greater confidence because they have been informed by policy so know what to do and not to do.</p> <p>Having a clear, easy to understand policy that is well communicated should help prevent crime.</p> <p>By preventing criminal activity, it should thereby reduce stress and pressure on colleagues.</p>	<p>All colleagues, especially those working with large procurement contracts or directly with service users.</p> <p>Colleagues on low income</p> <p>Colleagues experiencing financial hardship</p> <p>All colleagues. Colleagues with low literacy.</p> <p>Local Edinburgh businesses.</p> <p>Colleagues dealing with / partnering with local businesses.</p> <p>All colleagues.</p> <p>All colleagues. Citizens of Edinburgh.</p> <p>All colleagues.</p>
<p>Negative</p> <p>None identified – only potential where colleagues choose not to follow the policy.</p>	<p>All colleagues.</p>

- 10. Consider how you will communicate information about this policy/ service change to children and young people and those affected by sensory impairment, speech impairment, low level literacy or numeracy, learning difficulties or English as a second language? Please provide a summary of the communications plan.**

This is an internal colleague policy. The Policy will be written in Plain English. It is expected that line managers will also be responsible for the dissemination and promotion of this policy and be able to explain the core components to colleagues.

We will work with Communications to ensure the policy and the procedures are communicated at launch, in a variety of mediums to ensure as much coverage as possible across all colleague groups.

- 11. Is the plan, programme, strategy or policy likely to result in significant environmental effects, either positive or negative? If yes, it is likely that a Strategic Environmental Assessment (SEA) will be required and the impacts identified in the IIA should be included in this. See section 2.10 in the Guidance for further information.**

Not applicable.

- 12. Additional Information and Evidence Required**

If further evidence is required, please note how it will be gathered. If appropriate, mark this report as interim and submit updated final report once further evidence has been gathered.

- 13. Specific to this IIA only, what recommended actions have been, or will be, undertaken and by when? (these should be drawn from 7 – 11 above) Please complete:**

Specific actions (as a result of the IIA which may include financial implications, mitigating actions and risks of cumulative impacts)	Who will take them forward (name and job title)	Deadline for progressing	Review date
Ensuring training is delivered within working hours and multiple sessions offered to ensure colleagues on alternative working patterns can attend	Risk Management	ongoing	

Specific actions (as a result of the IIA which may include financial implications, mitigating actions and risks of cumulative impacts)	Who will take them forward (name and job title)	Deadline for progressing	Review date
Ensure training is offered in person as well as online, as not all colleagues will have access to devices – work or personal.	Risk Management	ongoing	
Ensure policy communications are shaped to remind colleagues of the importance on following appropriate processes, e.g. procurement, to prevent the risk of bribery	ER & Policy Team	Launch of Policy	1 April 2025

14. Are there any negative impacts in section 8 for which there are no identified mitigating actions?

Not applicable.

15. How will you monitor how this proposal affects different groups, including people with protected characteristics?

Information on those attending training sessions will be held by the appropriate teams to ensure wide awareness raising.

Where cases of bribery do arise, this information will be recorded within existing HR systems and be reportable on protected characteristics while still ensuring appropriate confidential disciplinary rules.

16. Sign off by Head of Service

Name *Nareen Turnbull*

Date *28/01/2025*

17. Publication

Completed and signed IIAs should be sent to:
integratedimpactassessments@edinburgh.gov.uk to be published on the Council website www.edinburgh.gov.uk/impactassessments

Edinburgh Integration Joint Board/Health and Social Care
sarah.bryson@edinburgh.gov.uk to be published at
www.edinburghhsc.scot/the-ijb/integrated-impact-assessments/