

Human Resources Policy Review

1. INTRODUCTION

- 1.1 The purpose of this report is to provide the Partnership Board with an update on the review of SEStran's employment and governance-related policies: Anti-Bribery and Corruption Policy, Anti-Fraud Policy, Public Interest Disclosure (Whistleblowing) Policy and new Conflict of Interest Policy.
- 1.2 This report has been considered and approved by the Performance and Audit Committee at its meeting on 11th September 2026.

2. BACKGROUND

- 2.1 SEStran is committed to maintaining a suite of up-to-date policies that support good governance, transparency, accountability and compliance with relevant legislative and regulatory requirements.
- 2.2 As part of the rolling policy review programme, officers have undertaken a review of a number of key policies relating to standards of conduct, fraud prevention, bribery and corruption, whistleblowing, and conflicts of interest. Legal support was provided by Anderson Strathern to ensure the policies reflect current good practice and provide appropriate guidance for employees and office holders.
- 2.3 The review also responds to recommendations arising from recent Internal Audit work relating to governance arrangements and the organisation's policy framework.

3. POLICY REVIEW FINDINGS

- 3.1 Following review, four policies are presented for consideration.

3.1.1 Anti-Bribery and Corruption Policy

The policy has been updated and renamed from the former Anti-Bribery Policy to better reflect its broader scope. Key changes include:

- Inclusion of corruption provisions within the policy
- Removal of conflict of interest provisions, which now form a standalone policy
- Removal of the section on adequate procedures to improve clarity and focus
- Extension of the review cycle from annual to biennial

3.1.2 **Anti-Fraud Policy**

The policy has been updated to improve clarity and alignment with current arrangements. Changes include:

- Removal of corruption-related provisions which are now addressed through the Anti-Bribery and Corruption Policy
- Updated definition of fraud

3.1.3 **Public Interest Disclosure Policy**

The policy has been updated to strengthen protections for individuals raising concerns and to reflect current terminology and legislative good practice. Changes include:

- Additional information on the scope of the policy
- Enhanced provisions regarding protection for whistleblowers
- Updating references from the Scottish Executive to the Scottish Government
- Extension of the review cycle from annual to biennial

3.1.4 **Conflicts of Interest Policy**

A new standalone Conflict of Interest Policy has been developed to provide a clear framework for identifying, declaring and managing conflicts of interest. The policy consolidates provisions previously contained within the Anti-Bribery Policy and includes a declaration process for relevant interests. The policy is intended to complement the separate arrangements already in place for Partnership Board Members.

4. **GOVERNANCE AND RISK IMPLICATIONS**

4.1 The reviewed policies support SEStran's commitment to high standards of governance, integrity and ethical conduct. They provide clearer guidance for employees and support the organisation's arrangements for preventing fraud, bribery and corruption, managing conflicts of interest, and encouraging the reporting of concerns.

4.2 The implementation of these policies will contribute to mitigating governance and compliance risks identified within the corporate risk register and supports the organisation's wider assurance framework.

5. **CONSULTATION**

5.1 The policies have been reviewed by Anderson Strathern and considered by officers and arrangements are now being made for staff awareness and training to support implementation. Correspondence from Anderson Strathern confirmed that no specific legislative updates were required beyond the revisions incorporated through the review process.

6. RECOMMENDATIONS

- 6.1 It is recommended that the Partnership Board notes the contents of this report.

Angela Chambers
Business Manager
18 September 2026

Links to Policies:

[1 Anti-Bribery and Corruption Policy](#)

[2 Anti-Fraud Policy](#)

[3 Public Interest Disclosure Policy](#)

[4 Conflict of Interest Policy](#)

Policy Implications	The recommendations in this report support SEStran's commitment to maintaining an effective and up-to-date policy framework and strengthen the organisation's governance arrangements.
Financial Implications	There are no direct financial implications arising from approval of the revised policies. Any staff training requirements will be met from existing budgets.
Equalities Implications	The revised policies support fair and transparent organisational practices and provide appropriate protections for employees who raise concerns in the public interest.
Climate Change Implications	There are no direct climate change implications arising from this report.