

# Anti-bribery Policy Statement

## 1.0 General Principles

- 1.1 Leeds Trinity University is a successful university community inspired by Catholic values and prides itself on its reputation for acting fairly and ethically in carrying out its activities.
- 1.2 The University is committed to ensuring that its business is conducted in a fair and transparent way and will take all appropriate steps to address the risk of bribery.
- 1.3 The University condemns all acts of bribery or corruption and will not tolerate it in its activities or in those it engages with. Any cases brought to its attention will be investigated and dealt with appropriately.

## 2.0 Definition and Scope

2.1 Bribery can be commonly described as giving someone a financial or other advantage to encourage that person to perform their functions or activities improperly.

2.2 It includes seeking to influence the actions of someone by the offering, promising, giving, receiving or soliciting of a financial, academic or other advantage.

2.3 In accordance with its principles and relevant legislation, the University prohibits the offering, giving, solicitation or receiving of any bribe, whether cash or other inducement, regardless of size:

- to or from any person, company or other organisation, wherever they are situated and whether they are a public official or body, private individual or company by any individual employee, agent or other person acting on the University's behalf
- in order to gain any commercial, contractual or regulatory advantage for the University
- or in order to gain any personal advantage, pecuniary or otherwise, for the individual or anyone connected with the individual.

2.4 This prohibition includes facilitation payments made to public officials for securing or accelerating routine processes and procedures.

2.5 It is not the intention of the policy to prevent such common practice as normal and appropriate levels of hospitality or the giving and receiving of business or ceremonial gifts. Such hospitality or gifts must however be proportionate and in moderation and must not place employees in a situation which might compromise their integrity or place any expectation to reciprocate in any way.

2.6 For the protection of those involved, the Director of Finance will maintain a register of gifts and hospitality, both given and received, where the value is in excess of £50 for gifts and £150 for hospitality. Members of staff either giving or in receipt of such gifts or hospitality should inform the Director of Finance promptly. Further guidance is contained within Finance Procedure 4: Code of Conduct for Staff.

## 3.0 Responsibilities

3.1 The University is responsible for making all relevant persons aware of this policy and for ensuring that relevant procedures are in place for the prevention, detection and reporting of bribery.

3.2 The Audit Committee has a general responsibility to oversee the operation and effectiveness of anti-bribery arrangements and should receive appropriate reports on any bribery activity.

3.3 All members of staff, or other person who performs a service for or otherwise represents the University, are responsible for:

- compliance with this policy with respect to the prevention, detection and reporting of bribery
- acting with propriety in the use of official resources and the handling and use of public funds
- conducting themselves in accordance with the principles of public life set out in the Nolan Committee's first report Standards in Public Life, which are: selflessness, integrity, objectivity, accountability, openness, honesty and leadership
- reporting immediately any attempted bribery or suspicion of bribery in line with section 4 below.

## 4.0 Action in the event of bribery

4.1 All cases of actual or suspected bribery will be vigorously and promptly investigated and appropriate action will be taken. Where appropriate the University Disciplinary Procedure will be invoked.

4.2 Any known or suspected bribery or attempted bribery must be reported immediately under the procedures outlined in the Whistleblowing policy, a copy of which is available on the University's website.

4.3 All instances of actual or attempted bribery will be formally reported to the Audit Committee.