



## ANTI-BRIBERY POLICY

<b>Responsibility for Policy:</b>	University Secretary & Deputy Chief Executive
<b>Relevant to:</b>	All staff and other workers
<b>Approved by:</b>	SMT and by Board of Governors on annual basis.
<b>Responsibility for Document Review:</b>	Director of Legal & Governance Services
<b>Date introduced:</b>	July 2011
<b>Date(s) modified:</b>	Reviewed on annual basis and last reviewed April 2018
<b>Next Review Date:</b>	April 2019

### RELEVANT DOCUMENTS

Please see list set out below.

### RELATED POLICIES & DOCUMENTS

Please see list set out below.

## **1. Statement by the Chairman of the Board of Governors**

Liverpool John Moores University values its reputation for ethical behaviour and financial probity.

It is University policy to comply with all applicable anti-bribery laws and the University will not tolerate any form of bribery and corruption.

The Board of Governors of the University expects that all staff, associates and agents will conduct business in accordance with the highest standards of ethical behaviour.

Bribery or any form of corruption by a member of staff of the University will be considered gross misconduct and the member of staff may face dismissal.

Agents, consultants and business partners who work with or on behalf of the University must act with integrity and behave ethically. The University will terminate agreements with such agents, consultants and business partners in the event of any breach of anti-bribery law, corruption or unethical behaviour.

## **2. Objective**

This Anti-Bribery Policy provides a coherent and consistent framework to enable University staff, contractors, associates, joint venture partners, consortium partners and agents to understand and implement arrangements enabling compliance with the Bribery Act 2010. In conjunction with related policies, procedures and documents it will enable staff to identify and manage effectively any potential breach of the anti-bribery legislation.

## **3. Scope**

### **3.1 The Policy prohibits:**

- the offering, promising, or giving of any bribe, whether cash or other inducement;
  - the requesting, agreeing to receive or acceptance of any bribe, whether cash or other inducement;
  - the offer, promise or giving of a financial or other advantage to a foreign public official;
- in order to obtain or retain business or an advantage in the conduct of business.

### **3.2 The policy extends to all University staff, contractors, associates, joint venture partners, consortium partners and agents.**

### **3.3 The policy extends to University operations anywhere in the world, including international agents, subsidiaries, subcontractors under commercial contracts, collaboration partners and consortium partners.**

#### **4. Policy Framework**

The Policy, together with the related policies and documents, provides the framework to ensure that all University staff, contractors, associates, joint venture partners, consortium partners and agents meet all the legal and regulatory requirements governing the lawful and ethical conduct of business by:

- Prohibiting staff and all those acting on behalf of the University from receiving, offering, promising, improperly influencing payment, authorising payments or contract awards, directly or indirectly, in return for anything of value;
- Prohibiting payments including 'facilitation' payments to others in order secure prompt or proper performance of routine duties;
- Ensuring that transactions are properly and accurately recorded;
- Ensuring that all breaches or suspected breaches of this policy are fully investigated and, if appropriate, disciplinary measures are invoked and prompt action taken to remedy the breach;
- Making all staff aware of their personal responsibilities and duty to adhere strictly to this policy at all times;
- Providing information and further guidance to all staff if there is uncertainty regarding the requirements;
- Providing information to all staff on the procedures available to report any breach or suspected breach of this policy;
- Ensuring that, before establishing a relationship with a third party, that sufficient due diligence is performed to determine the third party commitment to ethical business practice consistent with this policy;
- Including appropriate clauses in agreements with third parties to ensure that parties acting on the University's behalf do not engage in any illegal or improper conduct, in particular in connection with international ventures if there are factors which may increase the risk of breach of this policy, such as custom and practice within the country of operation.

#### **5. Raising Concerns and Seeking Guidance**

If and when an instance of bribery is identified or suspected it should be reported under the University's Whistleblowing Policy which contains details of whom to contact should there be any concerns or doubts as to whether an act constitutes bribery. If any instance of bribery is identified, the University will take appropriate steps in line with the procedures described in the Whistleblowing Policy.

#### **6. Training and Communication**

The University will communicate this policy and relevant guidance to all staff who will receive training appropriate to their role. This policy will also be communicated to contractors, associates, joint venture partners, consortium partners and agents and contractual obligations will be included in agreements with such parties obliging them

to agree to comply with this anti-bribery policy or with their own policy if it provides an equivalent level of protection.

## **7. Monitoring and Review**

- 7.1** The Policy Lead will action a review of this policy statement and related policies on an annual basis. Any changes needed to ensure effectiveness will be drawn to the attention of the Audit Committee of the Board of Governors and the Board itself. The Director of Legal & Governance Services reserves the right to amend this document at any time should the need arise.
- 7.2** Each contractor, associate, joint venture partner, consortium partner and agent of the University will be encouraged to put in place similar arrangements to enable compliance to be monitored on an annual basis.

## **8. Key Contacts**

- Policy Owners – the Board of Governors of the University.
- Policy Lead – University Secretary & Deputy Chief Executive.
- First point of contact for reporting suspected breaches – Director of Legal & Governance Services.

## **9. Related Policies and Documents**

- Staff Handbook
- Bribery Risk Assessment Form
- Code of Conduct for Staff
- Disciplinary Procedures
- Financial Regulations
- Gifts and Hospitality Policy
- Financial Due Diligence Process
- Procurement Strategy
- Whistleblowing Policy (Disclosure under the Public Interest Disclosure Act 1998)
- Risk Management Policy