

**Anti-Bribery, Hospitality and Gift Policy**

**Approved; October 2018**

**For review; November 2025**

1. **Overview**
   1. Leeds Trinity Students’ Union is committed to the highest standards of ethical conduct and integrity in our activities. This policy outlines our position on preventing bribery. LTSU will not tolerate any form of bribery by, or of, its employees, trustees, or any person or body acting on LTSU’s behalf.
   2. The organisation is committed to having effective measures in place to prevent, monitor and eliminate bribery.
   3. This policy applies to all employees and officers and temporary workers, consultants, contractors, agents, and subsidiaries acting for or on behalf of Leeds Trinity Students’ Union
   4. Any breach of this policy is likely to result in disciplinary action and is potentially a criminal matter for the individual involved.
2. **The Bribery Act 2010**
   1. The Bribery Act 2010 prohibits employees or associated persons from offering, promising, giving, soliciting, or accepting a bribe.
   2. The bribe might be cash, a gift or other promise to, or from a person or organisation. For example, a bribe might made to convince an employee to act unfairly when deciding whether to maintain a business relationship with another organisation to gain a personal advantage for themselves or anyone connected with them.
   3. Under the Act, Leeds Trinity Students’ Union may face criminal liability for unlawful actions taken by its employees or associated persons.
   4. All employees must take particular care to ensure that all Leeds Trinity Students’ Union records are accurately maintained when dealing with any contracts or business activities in line with Financial Procedures. This includes all financial invoices and payment transactions with clients, suppliers, and public officials.
3. **Declaring Entertainment, gifts, and hospitality**
   1. You are required to keep accurate and up-to-date records of all hospitality and entertainment for any activity where you have received £25 or more from an organisation outside of Leeds Trinity Students’ Union, the University, or the National Union of Students (NUS) in your capacity as an employee of LTSU but does not include promotional items or samples from suppliers.
   2. A form for this can be completed at [www.ltsu.co.uk/staff](http://www.ltsu.co.uk/staff)  Additionally items given to third parties should also be declared on the same form should they be of a value of £25 or more.
4. **Entertainment, gifts, and hospitality**
   1. Leeds Trinity Students’ Union allows employees to accept some entertainment, gifts, and hospitality if it is in moderation and to maintain good business relationships. This is if it is in good faith and not offered, promised, or accepted to secure an advantage for LTSU or to influence the employee receiving the gift.
   2. Any gifts, rewards, or entertainment received or offered from clients, suppliers, or other business contacts should be reported immediately to your line manager. In certain circumstances, it may not be appropriate to keep such gifts or be provided with the entertainment and employees may be asked to return the gifts or refuse the entertainment.
   3. Generally, small tokens of appreciation, such as flowers or a bottle of wine, may be accepted providing they are of no value higher than £25.
   4. If an employee or associated person wishes to provide gifts to someone outside LTSU, approval from the individual’s line manager is required, together with details of the recipients and reasons for the gift. These will be authorised only in special circumstances and will be subject to a cap of £25 per recipient. You must always supply records and receipts and follow Leeds Trinity Students’ Union's expenses policy.
5. **Charitable donations**

5.1 Leeds Trinity Students’ Union considers that charitable giving forms part of its wider commitment to the community and directs all fundraising activities through our Raise and Giving activity.

1. **Reporting suspected bribery**
   1. Leeds Trinity Students’ Union depends on its employees to ensure that the highest standards of ethical conduct are maintained in all its activities. If you suspect or discover something of this nature, you are encouraged to report it immediately. Further details of how to do this and your rights to full protection can be found under Leeds Trinity Students’ Union Whistleblowing policy.
   2. Leeds Trinity Students’ Union will fully investigate any instances of alleged or suspected bribery in line with the Disciplinary Procedure. If the allegations are proven, they may result in a finding of gross misconduct and immediate dismissal. Depending on the circumstances, the matter may also be reported to the relevant authorities.