

## **Leeds Trinity SU Anti-Bribery, Hospitality and Gift Policy**

**Approved: July 2021**

**For Review: July 2023**

### **1. Overview**

1.1 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.

1.2 The organisation is committed to having effective measures in place to prevent, monitor and eliminate bribery.

1.3 This policy applies to all employees and officers and to temporary workers, consultants, contractors, agents and subsidiaries acting for or on behalf of Leeds Trinity SU.

1.4 Any breach of this policy is likely to result disciplinary action and is potentially a criminal matter for the individual involved.

### **2. The Bribery Act 2010**

2.1 The Bribery Act 2010 prohibits employees or associated persons from offering, promising, giving, soliciting or accepting a bribe.

2.2 The bribe might be cash, a gift or other promise to, or from a person or organisation. For example, a bribe might be made to convince an employee to act unfairly when deciding whether to maintain a business relationship with another organisation in order to gain a personal advantage for themselves or anyone connected with them.

2.3 Under the Act Leeds Trinity SU may face criminal liability for unlawful actions taken by its employees or associated persons.

2.4 All employees must take particular care to ensure that all Leeds Trinity SU 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**

3.1 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 SU, the University or the National Union of Students (NUS) in your capacity as an employee of LTSU.

3.2 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**

4.1 Leeds Trinity SU allows employees to accept some entertainment, gifts and hospitality provided that it is in moderation and for the purpose of maintaining good business relationships. This is provided that 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.

4.2 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.

4.3 As a general rule, small tokens of appreciation, such as flowers or a bottle of wine, may be accepted providing they are of no value higher than £25.

4.4 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 in accordance with Leeds TrinitySU's expenses policy.

## **5. Charitable donations**

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

## **6. Reporting suspected bribery**

6.1 Leeds Trinity SU 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 SU's Whistleblowing policy.

6.2 We 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.