

Anti-Bribery Policy



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1. Purpose

The purpose of this policy is to demonstrate how the Liverpool City Region Combined Authority (LCRCA) and Merseytravel (hereafter referred to as “the organisations”) are committed to taking a proactive approach to managing the risks associated with bribery.

2. Definition

Bribery is the provision of a financial or other advantage to someone to encourage that person to perform their functions or activities improperly or to reward that person for having already done so.

3. Policy Statement

We are committed to combating bribery and determined to identify employees who abuse their positions of trust or agents, consultants, contractors or suppliers who abuse their relationship with us.

In order to limit its exposure to bribery the organisations will:

- Inform employees how to recognise and prevent the use of bribery by themselves and others.
- Encourage the reporting of any suspicion of bribery and treat such reports appropriately in accordance with the organisations Confidential Reporting (Whistleblowing) Policy.
- Investigate allegations of bribery and assist the Police or other external agencies in any prosecution.
- Take disciplinary action against any employee(s) involved in bribery.

The organisations have a zero tolerance attitude to acts of bribery by anyone associated with it or acting on its behalf.

In accordance with the Bribery Act 2010, the organisations prohibit:

- the offering, giving, solicitation or acceptance of any bribe, whether cash or other inducement;
- to or from any person or company, wherever they are situated and whether they are a public official or body or private person or company;

- by any individual employee, agent or other person or body acting on the organisations behalf;
- in order to gain any commercial, contractual or regulatory advantage for the organisations; or
- in order to gain any personal advantage, pecuniary or otherwise, for the individual or anyone connected with the individual.

4. Scope

This Policy applies to all Employees. It is expected that agents, consultants, contractors, suppliers and any other people or bodies associated with the organisations will act in a manner consistent with this policy.

This policy is not meant to prohibit the following providing they are proportionate and properly recorded in the Register:

- the giving or receiving of appropriate gifts;
- the provision or acceptance of appropriate hospitality; and
- the use of any recognised fast-track process which is available to all on payment of a fee.

Inevitably, decisions as to what is acceptable may not always be easy. If anyone is in doubt as to whether a potential act constitutes bribery, the matter should be referred to their Head of Service or if necessary the Head of Internal Audit

5. Policy Evaluations

Evaluation of the policy will be undertaken as appropriate by the LCRCA Audit and Governance Committee and the Merseytravel Audit, Risk and Governance Board. Revisions to this Policy will be subject to formal approval by the organisations.

6. Responsibilities

The Head of Internal Audit is responsible for deploying this policy across the organisations.

Heads of Service are responsible for maintaining effective systems of internal control that will ensure the Anti-Bribery Policy is followed.