



**LIVERPOOL
CITY REGION**
COMBINED AUTHORITY



METROMAYOR
LIVERPOOL CITY REGION

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. Having such a policy is a key element of demonstrating the organisations’ compliance with the Bribery Act 2010.

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

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

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 prohibit the activities detailed in the Bribery Act 2010, and the main offences are summarised below (please refer to the legislation at www.legislation.gov.uk for the full details of the provisions of the Bribery Act 2010).

1. Bribing another person

This can occur where a person:

- offers, promises or gives a financial or other advantage to another person, and intends the advantage:
 - to induce a person to perform improperly a relevant function or activity, or
 - to reward a person for the improper performance of such a function or activity.
- offers, promises or gives a financial or other advantage to another person, and knows or believes that the acceptance of the advantage would itself constitute the improper performance of a relevant function or activity.

2. Being bribed

This can occur where a person:

- requests, agrees to receive or accepts a financial or other advantage intending that, in consequence, a relevant function or activity should be performed improperly
- requests, agrees to receive or accepts a financial or other advantage, and the request, agreement or acceptance itself constitutes the improper performance by the person of a relevant function or activity.
- requests, agrees to receive or accepts a financial or other advantage as a reward for the improper performance of a relevant function or activity.

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 these are proportionate and properly recorded in the Register:

- the giving or receiving of appropriate gifts;
- the provision or acceptance of appropriate hospitality;

For further information on the above, refer to the Gifts and Hospitality Policy

- 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 there is doubt as to whether a potential act constitutes bribery, the matter should be referred to the relevant Head of Service or if necessary, the Head of Internal Audit.

5. Policy Evaluation

This Policy will be reviewed and updated on an annual basis by the Head of Internal Audit. In the case of significant changes, the Policy will be presented for approval to the LCRCA Audit and Governance Committee and Merseytravel. However, as a minimum, the Policy will be presented for re-approval every five years.

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 to protect against bribery and report any suspicions where these exist.