



# HITRANS **ANTI-BRIBERY PROCEDURE**

(Covering all employees and Board Members)



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## 1. Introduction

- 1.1** This Procedure should be read in conjunction with HITRANS's Anti-Bribery Policy and Anti-Fraud and Corruption Policy.
- 1.2** This procedure is designed to provide a comprehensive framework for identifying, assessing, and mitigating bribery risks within HITRANS and ensuring compliance with the Bribery Act 2010.
- 1.3** Regular reviews of this procedure will ensure it reflects current legal guidelines, organisational developments, and risk environment.

## 2. The Bribery Act 2010

- 2.1** The Bribery Act 2010 came into force on 1 July 2011 and remains a fundamental piece of legislation that guides anti-bribery measures in the UK.
- 2.2** Under the Act, HITRANS is legally required to put in place adequate procedures designed to prevent bribery by or of persons associated with the organisation. This includes contractors, employees, agents, and third parties acting on HITRANS's behalf.
- 2.3** Failure to comply could result in criminal liability, both for individuals and the organisation, which may include significant fines and custodial sentences.
- 2.4** The Act is based on six principles, which are reflected in the procedural steps:
- Top Level Commitment
  - Risk Assessment
  - Proportionate Procedures
  - Due Diligence
  - Communication
  - Monitoring and Review

## 3. Step 1 – Establish Responsibility for Bribery Prevention Measures

- 3.1** The Partnership Director has overall responsibility for ensuring that HITRANS complies with the Bribery Act 2010 and for overseeing the implementation of anti-bribery measures across the organisation.
- 3.2** HITRANS will designate an Anti-Bribery Officer (or team) to assist in the daily management and implementation of the procedure. This individual/team will also be responsible for the continuous training of employees and the monitoring of compliance.

## 4. Step 2 – Carry Out a Risk Assessment

- 4.1** A comprehensive risk assessment should be carried out regularly to identify areas where HITRANS might be vulnerable to bribery.
- 4.2** The risk assessment will consider the nature of HITRANS's business activities, geographical locations, relationships with third parties, and the potential value and complexity of transactions.
- 4.3** A key aspect of the risk assessment is its annual review and updates to ensure all emerging risks are addressed. This may include:
- Transactions: Risk of bribery related to high-value or complex transactions.
  - Business Areas: Sectors or regions with high bribery risk.
  - Third Parties: Relationships with contractors, suppliers, and partners.
- 4.4** Risk levels should be assigned to different activities, and resources should be allocated accordingly to mitigate risks effectively.



## 5. Step 3 – Implement Proportionate Bribery Prevention Measures

- 5.1** Based on the risk assessment, HITRANS will implement anti-bribery measures that are proportionate to the risks identified. These measures will aim to:
- Minimise exposure to bribery.
  - Ensure that all transactions are transparent and compliant.
  - Maintain strict controls over expenses, hospitality, and procurement practices.
- 5.2** Specific controls may include:
- Comprehensive due diligence procedures for suppliers and contractors.
  - Clear approval processes for financial transactions.
  - Anti-bribery clauses in all contracts and agreements.

## 6. Step 4 – Review Due Diligence Measures

- 6.1** Due diligence involves assessing and monitoring any third parties HITRANS works with to ensure they comply with anti-bribery standards. This includes vetting suppliers, contractors, and potential business partners.
- 6.2** HITRANS should ensure its due diligence processes are:
- Thorough and documented.
  - Proportionate to the level of risk posed by the business relationship.
- 6.3** It is also crucial to ensure that appropriate monitoring and auditing of third parties continues throughout the lifespan of any contractual or business relationship.

## 7. Step 5 – Communication and Training

- 7.1** Internal Communication: The Anti-Bribery Policy and Procedure will be communicated regularly to all employees via internal communications channels, such as team briefings, emails from senior management, and training modules.
- 7.2** External Communication: HITRANS will also communicate its anti-bribery stance to all third parties, including contractors, suppliers, and partners, and ensure that they understand and comply with similar anti-bribery standards.
- 7.3** Training: All staff will undergo annual training on the importance of anti-bribery measures and how to recognise and report potential bribery. Specific training will be provided to staff in higher-risk areas.
- 7.4** Ongoing Awareness: Continuous communication will ensure that anti-bribery policies are maintained at the forefront of employees' minds, particularly as the risk landscape evolves.

## 8. Step 6 – Monitoring and Review

- 8.1** The Partnership Director will ensure that the Anti-Bribery Procedure is regularly reviewed to incorporate:
- Updates to the Bribery Act or any new legislation.
  - Results of audits, investigations, and employee feedback.
  - Changes in HITRANS's operations or risk profile.
- 8.2** Reviews will ensure the effectiveness of the procedure and identify opportunities for improvement. Annual monitoring reports will be prepared and discussed at senior management meetings.



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and will be reviewed at or before 30 April 2030.



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