



Ollscoil
Teicneolaíochta
an Atlantaigh

Atlantic
Technological
University

Anti-Corruption Policy

Version 1.1

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Approval:

This document requires the following approvals:

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Approved By:	Governing Body
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Written by:	Corporate Governance and Data Protection PSC
Approved by:	Audit and Risk Committee Working Group 4 (VPs for Finance and Corporate Service)
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Head of Function responsible	VP for Finance and Corporate Services (Secretary to the Governing Body)
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This Policy was approved by the Approving Authority on **11 December 2023**. It shall be reviewed and, as necessary, amended by the University annually. All amendments shall be recorded on the revision history section above.

Note: Prior to publication and dissemination of policies and procedures, documents must be reviewed for accessibility as part the University’s commitment to Equality, Diversity, and Inclusion (EDI). Further advice on accessibility can be obtained from the EDI Team.

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1. Introduction and Purpose

1.1 The objective of this policy is to create a working environment in Atlantic TU that encourages all staff to be alert to the possibility of corruption and know how to deal with it if it is suspected. In order to achieve this objective this policy sets out the responsibilities of such staff, students and Governing Body in relation to corruption.

1.2 This Policy provides details in relation to the following:

- a definition of corruption;
- responsibilities for corruption prevention and detection;
- procedures for reporting suspected and proven cases of corruption; or attempted corruption; and
- responsibilities for further action such as the investigation of suspected corruption and the prosecution of offenders.

1.3 This policy complies with the applicable anti-corruption and related legislation/Codes applicable to Atlantic TU, including but not exclusively the below:

- Criminal Justice (Corruption Offences) Act 2018
- Criminal Justice Act 2011;
- Ethics in Public Office Act 1995;
- Standards in Public Office Act 2001;
- Protected Disclosures Acts 2014 and 2022;
- Companies Act 2014;
- Regulation of Lobbying Act 2015; and

This Policy should be read in conjunction with other appropriate Atlantic TU policies.

2. Scope

2.1 This Policy applies to:

- all individuals working at every level and grade whether employed on a permanent, fixed- term or temporary contract, consultants, trainees, seconded staff, placement students, non- staff employees (NSP), agency staff, sponsors, or any other person associated with Atlantic TU, or any of Atlantic TU's related companies or their employees, wherever located; and
- members of the Governing Body and external members of Atlantic TU Committees in relation to their activities as members of such committees.

3. Definitions

3.1 Corruption can be defined as the abuse of entrusted power for private gain of the individual or company. Corrupt business practices put the interests of an individual or company before the interests of Atlantic TU, students, staff, the environment, communities and other key stakeholders.

Examples of prohibited behaviour include:

- Use of Atlantic TU funds or assets for any illegal, improper or unethical purpose; and
- Facilitation payments – giving money, goods or services to staff, third parties and/or government officials to perform, or speed up the performance of a specific activity.

3.2 Linked to corruption, a bribe is an inducement or reward offered, promised or provided in order to gain any commercial, contractual, regulatory or personal advantage, whether received intentionally or unintentionally.

4. Principles

- Atlantic TU believes in open, fair, and transparent ways of working.
- Atlantic TU takes a zero-tolerance approach to corruption across all its campuses and operations.
- All parties in the scope of this policy must act with honesty and integrity in relation to all Atlantic TU activities including third party transactions, student and staff interactions.
- Atlantic TU do not tolerate the offering or receipt of any form of bribe (including gifts, hospitality, sports tickets, or payments) in the expectation of giving or receiving unauthorised, unfair, unethical or personal advantage.
- All actual or attempted corruption should be reported, and action taken as described in this policy. Please see Section 6 for reporting procedures
- This policy does not prevent the University from accepting sponsorship for particular activities where such sponsorship is given in an open and transparent manner without the expectation of receiving unauthorised, unfair, unethical or personal advantage.

5. Responsibilities

5.1 Role of the Governing Body, President and Executive managers

- Governing Body: To review and approve this policy on a periodic basis.
- President: To ensure processes and procedures are in place within Atlantic TU to facilitate adherence to this policy.
- Executive managers: To monitor compliance with this policy, and to ensure instances of suspected corruption reported to them are investigated appropriately.

5.2 Role of Management

- It is the responsibility of management to ensure that all members of staff in their department are aware of Atlantic TU policies and procedures and that same are adhered to at all times.

5.3 Role of Staff and Students

- To read and understand this policy document.
- To adhere to the policy statements in this document at all times.
- To report suspected breaches of the policy in the appropriate manner.

5.4 Role of the Audit and Risk Committee

- To monitor matters arising under this policy.

6. Reporting

6.1 Members of staff, students and members of the Governing Body should report all cases or suspected cases of corruption to the office of one of the Atlantic TU Executive managers.

In making a report, individuals must take care to avoid making incorrect accusations or alerting suspected individuals.

6.2 Anonymous reporting is discouraged but, where supported by evidence, may form the basis of an investigation.

6.3 No person who suspects or discovers an act of bribery or corruption should attempt to conduct their own investigations.

6.4 Atlantic TU treats all information received confidentially. Investigation results will not be disclosed or discussed with anyone other than those who have a legitimate need to know. This is important in order to avoid damaging the reputations of persons suspected but subsequently found innocent of wrongful conduct and to protect Atlantic TU from civil liability.

7. Investigations

- 7.1 Atlantic TU commits to investigate all acts of corruption that are discovered or suspected. Every case will be thoroughly investigated and dealt with appropriately without regard to the position held or length of service of the individual(s) concerned, or their relationship to Atlantic TU.
- 7.2 The purpose of the investigation is to ascertain the facts and confirm or repudiate the suspicions which have arisen so that, if necessary, further investigation may be instigated
- 7.3 Any act of corruption involving members of staff, students or members of the Governing Body ascertained upon investigation, or pursuant to a criminal conviction, or through acknowledgement by the individual(s) concerned, shall result in the appropriate disciplinary and legal actions against them to include the possibility of termination of employment, restitution, and/or forwarding of information to the appropriate authorities for criminal prosecution. Where appropriate, suspected corruption will be reported to the Gardai or other appropriate civil authorities for investigation.