



Anti-Bribery and Corruption Policy

Introduction

1. The University is committed to acting lawfully, ethically and with integrity in all its dealings, wherever it operates in the world. As part of this firm commitment, all forms of bribery and corruption are considered to be unacceptable. This is not just a cultural commitment on the part of the institution, it is a legal requirement to demonstrate appropriate compliance.
2. This Anti-Bribery and Corruption Policy sets out how the University plans to prevent acts of bribery and corruption from taking place and is designed to comply with United Kingdom criminal legislation governing such activity. The legislation applies wherever in the world the incident takes place and thus has implications for all University activities, irrespective of location.
3. The stipulated standards of integrity require a level of individual personal responsibility. This policy thus applies to:
 - All geographic functions and locations within the University
 - All partners, branches, offices, and subsidiary companies
 - All University governors, students and staff, including temporary workers, irrespective of location or work.
4. It is the responsibility of each staff member, governor, student, contractor and others directly involved in acting on the University's behalf to comply with relevant legislation and the terms of this policy and its associated procedures, identify and report bribery situations where there is a suspicion or risk of bribery, and consider the duty to make appropriate disclosures as necessary.

What is bribery?

5. Bribery is the offer, promise, giving, demanding or acceptance of an advantage as an inducement for an action which is illegal, unethical, a breach of trust, or the improper performance of a contract. Corruption is the misuse of public office or power for private gain, or misuse of private power in relation to business outside government. Acts of bribery or corruption are designed to influence the individual in the performance of their duty and incline them to act dishonestly.
6. Bribes can take many forms, including money, unreasonable gifts, entertainment or hospitality, 'kickbacks', excessive commissions, 'facilitation'

payments, political/charitable contributions, unwarranted expenses, or anything else of value. It does not have to be the person to whom the bribe is offered, or who receives it, who is deemed to act improperly.

7. The University has a zero tolerance policy towards bribery and corruption which means that all forms are prohibited. Any breach of the terms of this policy could result in disciplinary action being taken, with the possibility of dismissal. Certain offences under the Bribery Act carry criminal liabilities for the individuals concerned, with sanctions including significant fines and/or imprisonment.
8. Promising to make a bribe or agreeing to receive one is part of this prohibited conduct. It is not necessary for a bribe to have actually taken place for there to be liability. Bribery is prohibited in dealing with anybody, irrespective of whether they are based in the public or private sector.

Key Steps to Prevent Bribery and Corruption

9. **Risk assessment** is essential to the successful implementation of this policy as it identifies the specific areas where the University is exposed to the risk of bribery, allows the risks to be evaluated and appropriate risk mitigation to be put in place. All activities, especially those conducted overseas, should be assessed for vulnerability on an ongoing basis. This monitoring, review and repeated risk assessment will protect the institution better and facilitate more effective responses to changes in external circumstances and new activities.
10. The **keeping of accurate records** is a key strand of managing the risks. Many serious bribery and corruption offences have been found to involve a level of inaccurate record keeping. Financial reporting and good record keeping should be maintained for all activities and for all third party representatives acting on behalf of the University. Misleading or inaccurate records could damage the institution's reputation and result in a perceived failure to take the necessary steps to prevent corrupt practices.
11. **Effective monitoring and control** are required to ensure that, once the risks have been identified, any procedures which may need to be amended to mitigate those risks are refined on an ongoing basis.
12. Typical bribery and corruption risks arise in the following areas:

Gifts and hospitality

Giving or receiving gifts and hospitality can be an important aspect of developing and maintaining business relationships. Nonetheless, all such gifts and hospitality should be for a genuine reason, reasonable and given in the ordinary course of business. They must comply with the University's Gifts and Hospitality Policy.

Unduly lavish or unreasonable gifts, whether given or received, are generally unacceptable as they can create the impression of trying to engineer favourable business treatment by bestowing personal benefits. The gifts and hospitality themselves can be a bribe. It is not acceptable to request, accept or offer gifts

or entertainment intended to influence, support or reward any existing or future business involving the University.

A Gifts and Hospitality Register should be established and maintained by each School and Service recording all gifts and entertainment received or offered in excess of the thresholds indicated in the policy. The general thresholds are £50 for gifts and £100 per person for hospitality/entertainment. These records should be sent on a quarterly basis to the Head of Governance and Legal Services to be held centrally.

Facilitation payments

In some countries, it is customary business practice to make payments or gifts of small value to junior government officials in order to speed up or facilitate a routine action or process. All such facilitation payments are prohibited under this policy, or anything which might be interpreted as such unless expressly permitted under local legislation. The University will not tolerate such payments being made by any employee or person acting on its behalf.

In the event that a facilitation payment is extorted or payment is required under duress or where there are personal safety issues, staff must contact Governance and Legal Services as soon as possible for advice. Any payments made in this way must be appropriately recorded to reflect the nature of the transaction.

Agents, suppliers and joint venture partners

Under the terms of the legislation, the University could be liable for the actions of people acting on its behalf. This refers to all types of third parties and includes agents, suppliers and joint venture partners. The University is committed to promoting compliance with all anti-bribery and corruption policies by all third parties acting on its behalf. Staff are responsible for evaluating the risks of each third-party relationship; where specific risks are identified, enhanced controls will be required to monitor and control the risk.

Arrangements with third parties should include a standard anti-bribery clause in any contract or memorandum of understanding. The University will not engage with any third party where engagement in bribery or corruption is known or suspected. Due diligence should be conducted before any third party is engaged, with further investigation potentially required for transactions identified as being at higher risk, together with closer monitoring and control.

Procurement

All contracts should include a standard anti-bribery clause and the procurement of services from a third party must follow the required procedures. If the anti-bribery provisions are breached by any third party, the contracts may be terminated. Contractors and suppliers should be made aware of the University's Anti-Bribery Policy and associated policies.

Training

13. Training is provided to relevant staff throughout the University to support them in complying with their responsibilities with reference to this policy. Staff working in certain areas of the University may be required to confirm that they have understood and comply with the policy on an annual basis and attend refresher training if there are any changes.

Whistleblowing

14. The University is committed to ensuring that staff can speak with confidence if they have any concerns in relation to this policy or need to ask for assistance. If they suspect or observe anything which might contravene this policy, they have an obligation to report it. Staff are encouraged to report any such concerns to their line manager in the first instance. If this should not be possible, staff should contact Governance and Legal Services or make use of the Public Interest Disclosure (Whistleblowing) Policy.
15. No retaliation of any type will be tolerated against those who raise concerns or report what they genuinely believe to be in appropriate behaviour. All such reports will be treated in the strictest confidence.
16. This policy forms part of a suite of anti-bribery and corruption measures and should be read in conjunction with the following:
 - Financial Regulations
 - Gifts and Hospitality Policy
 - Procurement Regulations
 - Register of Interests Policy
 - Public Interest Disclosure (Whistleblowing) Policy
 - Student Disciplinary Regulations
 - Staff Disciplinary Policy