

ANTI-FRAUD AND BRIBERY POLICY

Introduction

1. The University is committed to the highest standards of ethical conduct and integrity in its business activities in the UK and overseas. This policy outlines the University's position on preventing and prohibiting fraud, bribery and corruption in all jurisdictions in which the University operates and provides information and guidance to those working for the University on how to recognise and deal with bribery and corruption.
2. Over and above the requirement to prevent fraud, the University is bound by the law of the United Kingdom including, the Bribery Act 2010, in respect of its conduct at home and abroad. The University will not tolerate any form of fraud, bribery or corruption by, or of, its employees, agents or consultants or any person or body acting on its behalf. The University Board is committed to implementing effective measures to prevent, monitor and eliminate bribery and corruption.

Scope

3. This policy applies to all employees and officers of the University, and to temporary workers, consultants, contractors, agents, seconded staff, casual workers and agency staff, volunteers, interns and/or any subsidiaries of the University or their employees and/or any other person associated with and/or acting for or on behalf of the University wherever located ("associated persons") within the UK and overseas. Every employee and associated person acting for, or on behalf of, the University is responsible for maintaining the highest standards of business conduct. Any breach of this policy is likely to constitute a serious disciplinary, contractual and criminal matter for the individual concerned and may cause serious damage to the reputation and standing of the University.
4. The University may also face criminal liability for unlawful actions taken by its employees or associated persons under the Bribery Act 2010. All employees and associated persons are required to familiarise themselves and comply with this policy, including any future updates that may be issued from time to time by the University.
5. The Bribery Act 2010 has been in force from 1 July 2011. This policy covers:
 - 5.1 the main areas of liability under the Bribery Act 2010;
 - 5.2 the responsibilities of employees and associated persons acting for, or on behalf of, the University; and
 - 5.3 the consequences of any breaches of this policy.

6. All employees and associated persons are required to comply with this policy in accordance with the Bribery Act 2010 (reference below) and generally.

Bribery Act 2010

7. The University is committed to complying with the Bribery Act 2010 in its business activities in the UK and overseas.
8. In summary, a bribe is an inducement or reward offered, promised or provided in order to obtain any commercial, contractual, regulatory or personal advantage. It is defined under the Bribery Act 2010, as a financial or other type of advantage that is offered or requested with the:
 - 8.1 intention of inducing or rewarding improper performance of a function or activity; or
 - 8.2 knowledge or belief that accepting such a reward would constitute the improper performance of such a function or activity.
9. A relevant function or activity includes public, state or business activities or any activity performed in the course of a person's employment, or on behalf of another University or individual, where the person performing that activity is expected to perform it in good faith, impartially, or in accordance with a position of trust.
10. A criminal offence will be committed under the Bribery Act 2010 if:
 - 10.1 an employee or associated person acting for, or on behalf of, the University offers, promises, gives, requests, receives or agrees to receive bribes; or
 - 10.2 an employee or associated person acting for, or on behalf of, the University offers, promises or gives a bribe to a foreign public official with the intention of influencing that official in the performance of his/her duties (where local law does not permit or require such influence); and
 - 10.3 the University does not have the defence that it has adequate procedures in place to prevent bribery by its employees or associated persons.
11. All employees and associated persons are required to comply with this policy, in accordance with the Bribery Act 2010.

What is Prohibited?

12. The University prohibits employees or associated persons from offering, promising, giving, soliciting or accepting any bribe. The bribe might be cash, a gift or other inducement to, or from, any person or company, whether a public or government official, official of a state-controlled industry, political party or a private person or company, regardless of whether the employee or associated person is situated in the UK or overseas. The bribe might be made to ensure that a person or company improperly

performs duties or functions (for example, by not acting impartially or in good faith or in accordance with their position of trust) to gain any commercial, contractual or regulatory advantage for the University in either obtaining or maintaining the University's business, or to gain any personal advantage, financial or otherwise, for the individual or anyone connected with the individual.

13. This prohibition also applies to indirect contributions, payments or gifts made in any manner as an inducement or reward for improper performance, for example through consultants, contractors or subcontractors, agents or sub-agents, sponsors or sub-sponsors, joint-venture partners, advisors, customers, suppliers or other third parties.

Records

14. Employees are required to comply with the [University's Financial Policies and Procedures](#). It is available on the University Intranet.
15. Employees and, where applicable, associated persons, are required to take particular care to ensure that all University records are accurately maintained in relation to any contracts or business activities, including financial invoices and all payment transactions with clients, suppliers and public officials.
16. Due diligence should be undertaken by employees and associated persons prior to entering into any contract, arrangement or relationship with a potential supplier of services, agent, consultant or representative in accordance with the University's risk management policy.
17. Employees and associated persons are required to keep accurate, detailed and up-to-date records of all corporate hospitality, entertainment or gifts accepted or offered.

Working Overseas

18. Principle

- 18.1 Employees and associated persons conducting business on behalf of the University outside the UK may be at greater risk of being exposed to bribery or unethical business conduct than UK-based employees. Employees and associated persons owe a duty to the University to be extra vigilant when conducting international business.

19. Procedure

- 19.1 Employees and associated persons are required to co-operate with the University's risk management policy and to report suspicions of fraud or bribery to the Deputy Vice Chancellor Finance and Operations. While any suspicious circumstances should be reported, employees and associated persons are required particularly to report:

- 19.1.1. close family, personal or business ties that a prospective agent, representative or joint-venture partner may have with government or corporate officials, directors or employees;
 - 19.1.2. a history of corruption in the country in which the business is being undertaken;
 - 19.1.3. requests for cash payments;
 - 19.1.4. requests for unusual payment arrangements, for example via a third party;
 - 19.1.5. requests for reimbursements of unsubstantiated or unusual expenses; or
 - 19.1.6. a lack of standard invoices and proper financial practices.
 - 19.1.7. The provision of inflated invoices over and above the standard price for the service or goods to be delivered.
- 19.2 If an employee or associated person is in any doubt as to whether or not a potential act constitutes fraud, potential fraud or bribery, the matter should be referred to the Deputy Vice Chancellor Finance and Operations.

Facilitation Payments

20. Principle

- 20.1 The University prohibits its employees or associated persons from making or accepting any facilitation payments. These are payments made to government officials for carrying out or speeding up routine procedures. They are more common overseas. Facilitation payments are distinct from an official, publicly available fast-track process. Facilitation payments, or offers of such payments, will constitute a criminal offence by both the individual concerned and the University under the Bribery Act 2010, even where such payments are made or requested overseas. Employees and associated persons are required to act with greater vigilance when dealing with government procedures overseas.

21. Procedure

- 21.1 Where a public official has requested a payment, employees or associated persons should ask for further details of the purpose and nature of the payment in writing. If the public official refuses to give these, this should be reported immediately to the Deputy Vice Chancellor Finance and Operations.
- 21.2 If the public official provides written details, the Deputy Vice Chancellor Finance and Operations will consider the nature of the payment. Local legal advice may be sought by the University.

- 21.3 If it is concluded that the payment is a legitimate fee, for example part of a genuine fast-track process, or is permitted locally, the University may authorise the employee to make the payment.
- 21.4 Where the Deputy Vice Chancellor Finance and Operations considers that the request is for a facilitation payment, the employee or associated person will be instructed to refuse to make the payment.
- 21.5 The University will seek the assistance of the relevant employee in its investigation and may determine that the matter should be referred to the prosecution authorities.
- 21.6 If an employee or associated person has any other concerns about the nature of a request for payment, he/she should report it to the Deputy Vice Chancellor Finance and Operations in writing and in accordance with the University's [Whistleblowing Policy](#).

Corporate Entertainment, Gifts, Hospitality and Promotional Expenditure

22. Principle

- 22.1 This policy does not prohibit normal and appropriate hospitality (given and received) to or from third parties and the University permits corporate entertainment, gifts, hospitality and promotional expenditure that are undertaken:
 - 22.1.1. for the purpose of establishing or maintaining good business relationships;
 - 22.1.2. to improve the image and reputation of the University; or
 - 22.1.3. to present the University's services effectively;provided that it is:
 - 22.1.4. arranged in good faith, and;
 - 22.1.5. not offered, promised or accepted to secure an advantage for the University or any of its employees or associated persons or to influence the impartiality of the recipient,
 - 22.1.6. compliant with local law;
 - 22.1.7. given in the name of the University only;
 - 22.1.8. it does not include cash or cash equivalent;
 - 22.1.9. is appropriate in the circumstances (for example small gifts at Christmas time in the UK) and taking into account the reason for the gift it is of an appropriate type and value (up to £100) and given at an appropriate time; given openly, not secretly.

- 22.2 The University will authorise only reasonable, appropriate and proportionate entertainment and promotional expenditure.
- 22.3 This principle applies to employees and associated persons, whether based in the UK or overseas. The University understands that the practice of hospitality and giving business gifts varies between countries and regions and what may be acceptable in one region may not be in another. In summary, the test to be applied is whether in all the circumstances the gift or hospitality is reasonable and justified. The intention behind the gift or hospitality should always be considered. Those with remits overseas will be given further training on the specific procedures that they are required to follow.

23. Procedure

- 23.1 Employees and, where relevant, associated persons should submit requests for proposed hospitality and promotional expenditure well in advance of proposed dates to the Head of Marketing.
- 23.2 Employees are required to set out in writing:
 - 23.2.1. the objective of the proposed client entertainment or expenditure;
 - 23.2.2. the identity of those who will be attending;
 - 23.2.3. the organisation that they represent; and
 - 23.2.4. details and rationale of the proposed activity.
- 23.3 The University will approve business entertainment proposals only if they demonstrate a clear business objective and are appropriate for the nature of the business relationship. The University will not approve business entertainment where it considers that a conflict of interest may arise or where it could be perceived that undue influence or a particular business benefit was being sought (for example, prior to a tendering exercise).
- 23.4 Any gifts, rewards or entertainment received or offered from clients, public officials, suppliers or other business contacts should be reported immediately to their manager. In certain circumstances, it may not be appropriate to retain such gifts or be provided with the entertainment and employees and associated persons may be asked to return the gifts to the sender or refuse the entertainment, for example, where there could be a real or perceived conflict of interest. As a general rule, small tokens of appreciation, such as flowers or a bottle of wine (up to a value of £100), may be retained by employees.
- 23.5 If a gift or entertainment of more than £100 is offered to a member of staff of the University and it may cause offence or appear disrespectful to decline – then it would be appropriate to accept. The gift or entertainment should then be reported to the Head of Finance who will record the nature of the

transaction – third party, value and reason for acceptance - on the corporate Gifts Register.

- 23.6 If an employee or associated person wishes to provide gifts to suppliers, clients or other business contacts, prior written approval from Head of Marketing is required, together with details of the intended recipients, reasons for the gift and business objective. These will be authorised only in limited circumstances and will be subject to a cap of £50 per recipient.
- 23.7 Employees and, where applicable, associated persons must supply records and receipts, in accordance with the University's expenses policy.

24. Charitable and political donations

- 24.1 The University does not make donations to any political parties. Employees and associated persons are not permitted to make any political donations to organisations on behalf of the University.

25. What practices are permitted?

- 25.1 This policy does not prohibit:
 - 25.1.1. normal and appropriate hospitality and entertainment with clients
 - 25.1.2. (please see the University's expenses policy); and
 - 25.1.3. the use of any recognised fast-track process that is publicly available on payment of a fee.

- 26. Any such practices must be proportionate, reasonable and made in good faith. Clear records must be kept.

Reporting Suspected Fraud or Bribery

27. Principle

- 27.1 The University depends on its employees and associated persons to ensure that the highest standards of ethical conduct are maintained in all its business dealings. The prevention, detection and reporting of bribery and other forms of corruption are the responsibility of all those working for the University or under the University's control. All employees and associated persons are required to avoid any activity that might lead to or suggest a breach of this policy and are requested to assist the University and to remain vigilant in preventing, detecting and reporting fraud, bribery and other forms of corruption.
- 27.2 Employees and associated persons should report any concerns that they may have to their Manager and to the Deputy Vice Chancellor Finance and Operations as soon as possible. Issues that should be reported include:

- 27.2.1. any suspected or actual attempts at bribery;
- 27.2.2. any suspected or actual attempts at fraud;
- 27.2.3. concerns that other employees or associated persons may be being bribed, attempted bribery or fraud; or
- 27.2.4. concerns that other employees or associated persons may be bribing or colluding in fraud with third parties, such as government officials or suppliers.

28. Procedure

- 28.1 Employees are required to report in writing any incidents of suspected bribery or fraud. Any such reports will be thoroughly and promptly investigated by the Deputy Vice Chancellor Finance and Operations in the strictest confidence. Employees and associated persons will be required to assist in any investigation into possible or suspected bribery.
- 28.2 Employees will also be required to comply with the University's Whistleblowing policy.
- 28.3 Employees or associated persons who report instances of bribery in good faith will be supported by the University. The University will ensure that the individual is not subjected to detrimental treatment as a consequence of his/her report. Any instances of detrimental treatment by a fellow employee because an employee has made a report will be treated as a disciplinary offence. An instruction to cover up wrongdoing is itself a disciplinary offence. If told not to raise or pursue any concern, even by a person in authority such as a manager, employees and associated persons should not agree to remain silent. They should report the matter to the Deputy Vice Chancellor Finance and Operations.

Action by the University

- 29. The University will fully investigate any instances of alleged or suspected fraud, bribery or other breaches of this policy. Employees suspected of fraudulent activity, bribery and/or other breaches of this policy may be suspended from their duties while the investigation is being carried out. The University will invoke its disciplinary procedures where any employee is suspected of fraudulent activity, bribery and/or other breaches of this policy, and proven allegations may result in a finding of gross misconduct and immediate dismissal. The University may terminate the contracts of any associated persons, including consultants or other workers who act for, or on behalf of, the University who are found to have breached this policy.
- 30. Failure to comply with the University's Financial Policies and Procedures may render the person responsible liable to disciplinary action, including in appropriate cases, dismissal.

31. The University may also report any matter to the relevant authorities, including the Director of Public Prosecutions, Serious Fraud Office, Crown Prosecution Services (CPS) and the police. The University will provide all necessary assistance to the relevant authorities in any subsequent prosecution.

VERSION MANAGEMENT

Responsible Department: Finance			
Approving Body: University Board (on recommendation of Operations Committee)			
Version no.	Key Changes	Date of Approval	Date of Effect
1.0	Initial Version	February 2026	February 2026
	No changes to the policy; reviewed and approved by University Board for AY 2026–27.	16 June 2026	September 2026
		Restricted Access? <i>Tick as appropriate:</i> Yes ☐ No ☒	