

1.1. It is the policy of the University that all staff and students conduct business in an honest way, and



auditable. The University expects our business partners, agents, suppliers and contractors to act with integrity and to avoid any actions that may be considered any offence within the meaning of the Bribery Act 2010.

- 5.1. Bribery refers to the act of offering, giving, promising, asking, agreeing, receiving, accepting, or soliciting something of value or of an advantage so to induce or influence an action or decision.
- 5.2. A bribe refers to any inducement, reward, or object/item of value offered to another individual in order to gain commercial, contractual, regulatory, or personal advantage.
- 5.3. Bribery is not limited to the act of offering a bribe. If an individual accepts a bribe, they are also breaking the law.
- 5.4. Bribery is illegal. Employees must not engage in any form of bribery, whether it be directly, passively (as described above), or through a third party (such as an agent or distributor). In particular employees must not bribe any foreign public officials anywhere in the world.
- 5.5. If employees are uncertain about whether something is, a bribe or a gift or act of hospitality, they must seek further advice from the Secretary to Council or the Head of Legal Services.

6.1. This section of the policy refers to 4 areas:

- a) Gifts and Hospitality.
- b) Facilitation payments.
- c)



facilitation payments tend to be made by low level officials with the intention of securing or speeding up the performance of a certain duty or action.

6.3.2. The University does not allow kickbacks to be made or accepted. The University recognises that kickbacks are typically made in exchange for a business favour or advantage.

6.4.

6.4.1. The University will not make donations, whether in cash, kind, or by any other means, to support any political parties or candidates, as the University recognises that this may be perceived as an attempt to gain an improper business advantage.

6.5.

6.5.1. The University accepts (and indeed encourages) the act of donating to charities – whether through services, knowledge, time, or direct financial contributions (cash or otherwise) – and agrees to disclose all charitable contributions it makes.

6.5.2. Employees must be careful to ensure that charitable contributions are not used to facilitate and conceal acts of bribery.

6.5.3. The University ensures that all charitable donations made are legal and ethical under local laws and practices, and that donations are not offered/made without the approval of the Secretary to the Council.

7.1. University employees will be required to comply with this policy, and with any training or other anti-bribery and corruption information provided by the University from time to time.

7.2. Employees will be responsible for the prevention, detection, and reporting of bribery and other forms of corruption and are required to avoid any activities that could lead to, or imply, a breach of t6



- Line Manager
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- 8.4.4. If you have reason to believe you've been subjected to unjust treatment as a result of a concern or refusal to accept a bribe, you should inform your Line Manager immediately.
- 9.1. The University will provide training on this policy to all staff as part of its mandatory training. Furthermore the University will provide relevant anti-bribery and corruption training to staff etc. where we feel their knowledge of how to comply with the Bribery Act needs to be enhanced. As good practice, all organisations should provide their employees with anti-bribery training where there is a potential risk of facing bribery or corruption during work activities.
- 9.2. The University's anti-bribery and corruption policy and zero-tolerance attitude will be clearly communicated to all suppliers, contractors, business partners, and any third-parties at the outset of business relations, and as appropriate thereafter.
- 10.1. The University will keep detailed and accurate financial records, and will have appropriate internal controls in place to act as evidence for all payments made. The University will declare and keep a written record of the amount and reason for hospitality or gifts accepted and given, and understand that gifts and acts of hospitality are subject to managerial review.
- 11.1. The Secretary to Council's responsible for monitoring the effectiveness of this policy and will review the implementation of it on a regular basis, and will assess its suitability, adequacy, and effectiveness.
- 11.2. This policy will be reviewed by the Audit Committee annually, or as and when any legislative changes occur, to ensure compliance with the principles of the act. Council will be advised of any action taken via the Annual Report from the Audit Committee.
- 11.3. Internal control systems and procedures designed to prevent bribery and corruption are subject to regular audits to ensure that they are effective in practice.
- 11.4. Employees may raise concerns at any time to the Secretary to Council or by using the University's then-current whistleblowing procedures.

Document author:	Secretary to Council
Document approver:	Audit Committee
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[i.e. employee of University/spouse/partner
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