



**UNIVERSITY
OF LONDON**

ANTI-CORRUPTION AND ANTI-BRIBERY POLICY

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ANTI-CORRUPTION AND BRIBERY POLICY

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1) **POLICY STATEMENT**

- 1.1 It is the University's policy to conduct all of its business in an honest and ethical manner. The University takes a zero-tolerance approach to bribery and corruption and is committed to acting professionally, fairly and with integrity in all its relationships and business dealings wherever it operates and to implement and enforce effective systems to counter bribery.
- 1.2 The University will uphold all laws relevant to countering bribery and corruption. The University remains bound by the laws of the UK, including the Bribery Act 2010, in respect of its conduct both at home and abroad.
- 1.3 The purpose of this Policy is to:
- (a) set out the University's responsibilities, and of those working for it, in observing and upholding its position on bribery and corruption; and
 - (b) provide information and guidance to those working for the University on how to recognise and deal with bribery and corruption issues.
- 1.4 Bribery and corruption are punishable for individuals by up to ten years' imprisonment and if the University is found to have taken part in corruption, it could face an unlimited fine and damage to its reputation. The University, therefore, takes its legal responsibilities very seriously.
- 1.5 The University has identified that certain of its activities create particular risks for the organisation, in particular:
- (a) overseas collaborations, joint ventures and partnerships (whether formal or informal);
 - (b) recruitment of students, particularly overseas.
 - (c) receipt of gifts and donations.
 - (d) grant funding; and
 - (e) public procurement, particularly where the activities relate to construction.
- 1.6 To address these risks the University has taken the following steps:
- (a) implemented an anti-corruption and anti-bribery policy.
 - (b) undertaken a risk assessment exercise, which will be subject to ongoing review.
 - (c) implemented a training programme for all staff to ensure they can recognise bribery and corruption and act accordingly to safeguard the university.

- (d) appointed the University Secretary as the individual with responsibility to ensure compliance with Bribery Act issues.
- (e) reviewed and amended policies related to this Anti-Corruption and Bribery Policy, including the Ordinance on Public Interest Disclosure; and
- (f) prepared standard clauses relating to Bribery Act issues for inclusion in key contractual documentation.

1.7 In this Policy, third party means any individual or organisation that a member of staff comes into contact with during the course of their work for the University, and includes actual and potential clients, customers, suppliers, distributors, business contacts, agents, advisers, and government and public bodies, including their advisors, representatives and officials, politicians and political parties.

2) **WHO IS COVERED BY THE POLICY?**

This Policy applies to all staff and workers, defined as all employees (whether permanent, fixed-term or temporary), consultants, contractors, seconded staff, homeworkers, casual workers and agency staff, volunteers, interns, any other person associated with the University, including members of the Board of Trustees, Collegiate Council and of the University's other committees, boards and groups, and any of its subsidiaries or their employees, wherever located (collectively referred to as workers in this Policy).

3) **WHAT IS BRIBERY?**

Under the UK Bribery Act 2010, bribery is defined as the offering, promising, giving, requesting, agreeing to receive, or accepting of an advantage (financial or otherwise) to induce or reward a person for improperly performing a relevant function or activity.

Bribery falls into the following four categories:

- Offering a bribe
- Receiving a bribe
- Bribing a foreign official
- Failure of a commercial organisation to prevent bribery.

Examples

Offering a bribe

You offer a potential business partner tickets to a major sporting event, but only if they agree to do business with us.

This would be an offence as you are making the offer to gain a commercial and contractual advantage. The University may also be found to have committed an offence because the offer has been made to obtain business for the University. It may also be an offence for the potential client to accept your offer.

Receiving a bribe

A supplier gives your nephew a job but makes it clear that in return they expect you to use your influence in the University to ensure it continues to do business with them.

It is an offence for a supplier to make such an offer. It would be an offence for you to accept the offer as you would be doing so to gain a personal advantage.

Bribing a Foreign Official

You arrange for the University to pay an additional payment to a foreign official to speed up an administrative process, such as clearing items through customs.

The offence of bribing a foreign public official has been committed as soon as the offer is made. This is because it is made to gain a business advantage for the University. The University may also be found to have committed an offence.

Failure of a commercial organisation to prevent bribery

A company or partnership can be held liable if it fails to prevent persons associated with it from engaging in bribery to obtain or retain business or an advantage in business. However, an organisation can defend itself if it proves it had adequate procedures in place to prevent bribery.

4) HOSPITALITY AND GIFTS

- 4.1 This Policy does not prohibit normal and appropriate hospitality (given and received) to, or from, third parties and the giving or receipt of gifts, provided that this is done in accordance with the University's *Gifts and Hospitality Policy and Procedures*.

5) **FACILITATION PAYMENTS AND KICKBACKS**

- 5.1 The University does not make, and will not accept, facilitation payments or "kickbacks" of any kind. Facilitation payments are typically small, unofficial payments made to secure or expedite a routine government action by a government official. They are not commonly paid in the UK but are common in some other jurisdictions.
- 5.2 If an individual is asked to make a payment on the University's behalf, he/she should always be mindful of what the payment is for and whether the amount requested is proportionate to the goods or services provided. A receipt should always be asked for which details the reason for the payment. If an individual has any suspicions, concerns or queries regarding a payment, they should be raised with the University Secretary.
- 5.3 Kickbacks are typically payments made in return for a business favour or advantage. All workers must avoid any activity that might lead to, or suggest, that a facilitation payment or kickback will be made or accepted by the University.

6) **DONATIONS**

The University does not make charitable donations or contributions to political parties. Any donation received from a political party or politically linked individual will be reviewed by the Development office in line with the University's Ethical Acceptance and Donations Policy.

7) **INDIVIDUAL RESPONSIBILITIES**

- 7.1 All workers must ensure that they read, understand, and comply with this Policy.
- 7.2 The prevention, detection and reporting of bribery and other forms of corruption are the responsibility of all those working for the University or under its control. All workers are required to avoid any activity that might lead to, or suggest, a breach of this policy.
- 7.3 All workers must notify their manager and/or the University Secretary as soon as possible if they believe or suspect that a conflict with this policy has occurred or may occur in the future. For example, if a client or potential client offers something to gain a business advantage with the University or indicates to that a gift or payment is required to secure their business. Further "red flags" that may indicate bribery or corruption are set out in the Schedule.
- 7.4 Any employee who breaches this Policy will face disciplinary action, which could result in dismissal for gross misconduct.

8) **RECORD-KEEPING**

- 8.1 The University must keep financial records and have appropriate internal controls in place which will evidence the business reason for making payments to third parties.
- 8.2 All workers must declare and keep a written record of all hospitality or gifts accepted or offered, which will be subject to managerial review.
- 8.3 All workers must ensure all expenses claims relating to hospitality, gifts or expenses incurred to third parties are submitted in accordance with the University's expenses policies and specifically record the reason for the expenditure.
- 8.4 All accounts, invoices, memoranda and other documents and records relating to dealings with third parties, such as clients, suppliers and business contacts, should be prepared and maintained with strict accuracy and completeness. No accounts must be kept "off-book" to facilitate or conceal improper payments.
- 8.5 All declarations of interest or perceived interests must be declared during any tender process and maintained as a part of the procurement project file.

9) **HOW TO RAISE A CONCERN**

All workers are encouraged to raise concerns about any issue or suspicion of malpractice at the earliest possible stage, in accordance with the University's Public Interest Disclosure Policy. The UoL's policy can be found by following the link provided, [UoL's Public Interest Disclosure \(Whistleblowing\) Policy and Procedure](#). Anyone that is unsure whether a particular act constitutes bribery or corruption, or if there are any other queries, these should be raised with the respective line manager and/or the University Secretary.

10) **WHAT TO DO IF YOU ARE A VICTIM OF BRIBERY OR CORRUPTION**

It is important for each worker to report to their respective line-manager and/or the Pro Vice- Chancellor (Partnership and Governance) as soon as possible if he/she is offered a bribe by a third party, is asked to make one, suspect that this may happen in the future, or believe that they are a victim of another form of unlawful activity.

11) **PROTECTION**

- 11.1 Workers who refuse to accept or offer a bribe, or those who raise concerns or report another's wrongdoing, are sometimes worried about possible repercussions. The University aims to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken.

11.2 The University is committed to ensuring that no one suffers any detrimental treatment as a result of refusing to take part in bribery or corruption, or because of reporting in good faith their suspicion that an actual or potential bribery or other corruption offence has taken place, or may take place in the future, in accordance with the University's Public Interest Disclosure Policy. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If anyone believes that they have suffered any such treatment, they should inform their line-manager and/or the Pro Vice- Chancellor (Partnership and Governance) immediately. If the matter is not remedied, members of staff should raise it formally using the University's Grievance Procedure.

12) **TRAINING AND COMMUNICATION**

12.1 All existing workers operating in areas that are perceived as high risk as far as the Bribery Act is concerned will receive regular, relevant training on how to implement and adhere to this Policy.

12.2 The University's zero-tolerance approach to bribery and corruption must be communicated to all suppliers, contractors, agents and business and other partners at the outset of the relationship with them and as appropriate thereafter.

13) **WHO IS RESPONSIBLE FOR THE POLICY?**

13.1 The Board of Trustees, advised by the University Secretary, has overall responsibility for ensuring this Policy complies with the University's legal and ethical obligations, and that all those under its control (including any suppliers or partners) complies with it.

13.2 Directors and heads of operational areas have primary and day-to-day responsibility for implementing this Policy, and for monitoring its use and effectiveness and dealing with any queries on its interpretation or referring them to the University Secretary. Management at all levels are responsible for ensuring those reporting to them are made aware of and understand this Policy and are given adequate and regular training on it.

14) **MONITORING AND REVIEW**

14.1 The University Secretary will monitor the effectiveness and review the implementation of this Policy, regularly considering its suitability, adequacy and effectiveness. Any improvements identified will be made as soon as possible. Internal control systems and procedures will be subject to regular audits to provide assurance that they are effective in countering bribery and corruption.

14.2 All staff are responsible for the success of this Policy and should ensure they use it to disclose any suspected danger or wrongdoing.

14.3 This Policy does not form part of any employee's contract of employment, and it may be amended at any time.

15) **POTENTIAL RISK SCENARIOS: "RED FLAGS"**

15.1 The following is a list of possible 'red flags' that may arise and which may raise concerns under various anti-bribery and anti-corruption laws. The list is not intended to be exhaustive and is for illustrative purposes only. If any of these 'red flags' are encountered, they must be reported promptly to the respective line manager or to the University Secretary:

- (a) you become aware that a third party engages in, or has been accused of engaging in, improper business practices.
- (b) you learn that a third party has a reputation for paying bribes, or requiring that bribes are paid to them, or has a reputation for having a "special relationship" with foreign government officials.
- (c) a third party insists on receiving a commission or fee payment before committing to sign up to a contract with us or carrying out a government function or process for us.
- (d) a third-party requests payment in cash and/or refuses to sign a formal commission or fee agreement, or to provide an invoice or receipt for a payment made.
- (e) a third party requests that payment is made to a country or geographic location different from where the third party resides or conducts business.
- (f) a third party requests an unexpected additional fee or commission to "facilitate" a service.
- (g) a third party demands lavish entertainment or gifts before commencing or continuing contractual negotiations or provision of services.
- (h) a third party requests that a payment is made to "overlook" potential legal violations.
- (i) you receive an invoice from a third party that appears to be nonstandard or customised.
- (j) a third party insists on the use of side letters or refuses to put terms agreed in writing.
- (k) you notice that we have been invoiced for a commission or fee payment that appears large given the service stated to have been provided.

- (l) a third party requests or requires the use of an agent, intermediary, consultant, distributor or supplier that is not typically used by or known to us; or
- (m) you are offered an unusually generous gift or offered lavish hospitality by a third party.

Version Control

Version	Approval	Change
ANTI-CORRUPTION AND ANTI-BRIBERY POLICY Version 2.1	Approved by the Board of Trustees on 16 July 2025.	Policy updated to reflect updated Gifts and Hospitality Policy and Procedures. "University Secretary" replaces "Pro Vice-Chancellor (Partnerships and Governance.)"
ANTI-CORRUPTION AND ANTI-BRIBERY POLICY Version 2	Pending Approval Recommended to BoT: VCEG 02.10.2024	Policy updated to better reflect the 2010 Bribery Act and better conform to other various internal University's policies. Pro Vice-Chancellor (Partnerships and Governance) replaces "University Secretary"
ANTI-CORRUPTION AND ANTI-BRIBERY POLICY Version 1	13.07.2016	Policy first formulated