

## **Response to the Bribery Act 2010: Policy and Guidance**

1. The university is committed to applying the highest standards of ethical conduct and integrity in its business activities. Every employee and individual acting on the university's behalf is responsible for maintaining the university's reputation and for conducting its business honestly and professionally.
2. Employees and others acting for or on behalf of the university are strictly prohibited from making, soliciting or receiving any bribes or unauthorised payments. A bribe is a financial advantage or other reward that is offered to, given to, or received by an individual or organisation (whether directly or indirectly) to induce or influence that individual or organisation to perform public or corporate functions or duties improperly.

### **Guidance**

3. The Ministry of Justice has published "[guidance about procedures which relevant commercial organisations can put into place to prevent persons associated with them from bribing](#)". The University is committed to implementing the principles of good practice contained in this guidance.

### **Assessment of Risk**

4. An initial assessment of risk would suggest an overall low to moderate level of risk based on the following factors:
  - a) The University and in particular the International Programmes operates in nearly all countries of the world including those in which bribery and/or facilitation payments are a common way of doing business and in which differing expectations of gifts and hospitality exist. We cannot rule out the possibility of bribery in our work; for example, certain activities of the International Programmes may have appreciable commercial value;
  - b) The University operates with a high level of transparency and governance visibility, always very aware of the importance of its reputation.
  - c) The University is a not-for-profit organisation with charitable status. Staff are not incentivised in a way that would encourage excessive risk taking.
  - d) The University already operates an extensive range of financial controls, checks and audits, and the International Programmes has standard procedures governing contacts with third parties.

### **Consequences of Deliberate Breaches of the Policy**

5. A breach of the university's anti-bribery policy by an employee will be treated as grounds for disciplinary action, which may result in a finding of gross misconduct, and dismissal. Employees and other individuals acting for the university should note that bribery is a criminal offence that may result in up to 10 years' imprisonment and/or an unlimited fine for the individual and an unlimited fine for the university.

### **Reporting Suspected Breaches of the Policy**

6. All employees and others acting for, or on behalf of, the university are encouraged to report any suspected bribery in confidence to the University's Finance Director.

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