

ANTI-BRIBERY AND CORERR R CRR O

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2.4 Bribery risks

It should be stressed that, in common with other Higher Education Institutions (HEIs), the University faces a range of bribery risks throughout its activities, operations and geographies.

These risks include, but are not limited to, bribery in relation to admissions, examinations, awards, procurement, construction, and field trips.

3 THE BRIBERY ACT 2010 AND OTHER LEGISLATION

3.1 The Bribery Act

It is a cleverly worded and comprehensive piece of legislation which has extensive scope

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3.2 Overseas reach

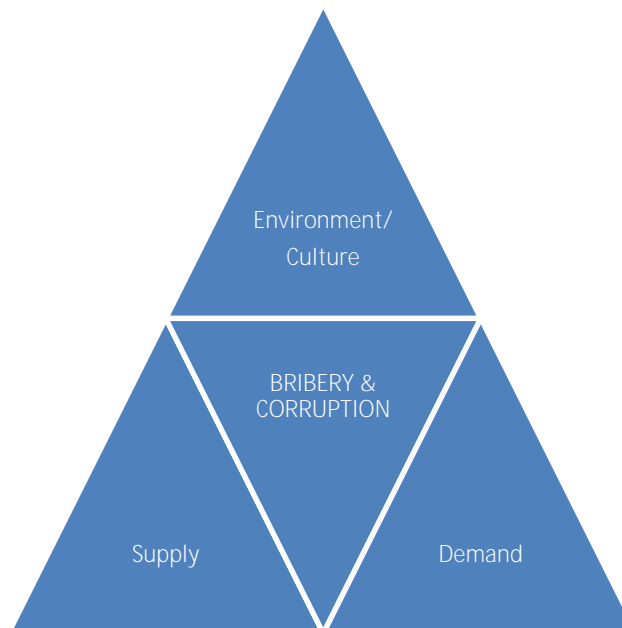
The Bribery Act has extensive global reach and holds UK organisations liable for failing to implement adequate procedures sufficient to prevent such acts by those working for the University or on its behalf, no matter where in the world the act takes place.

In addition, current US legislation (Foreign Corrupt Practices Act or FCPA) offers similar prohibitions and potential penalties, and is enforced robustly by the US authorities, supported by extensive inter-agency co-operation on an international basis.

3.3 Mitigation

There is a statutory defence against the Act if the University can demonstrate that it had in place appropriate adequate procedures designed to prevent bribery.

below, shows the three key drivers of bribery and corruption: environment and culture, supply of money, goods, services and favours as the currency of bribery, and demand for that currency:



-bribery and corruption procedures are intended to directly mitigate its risk of bribery and corruption by impacting the three elements of the bribery triangle - by changing the organisational environment and culture, by removing/restricting the supply of money, goods, services, and favours and/or reducing the demand for bribery.

Reducing the demand for bribery, although clearly challenging, can be achieved in several higher education sector.

hospitality. Those circumstances might, for example, include the proximity of the hospitality to the award of a contract. The gift or receipt of hospitality which is aimed at securing an is obviously not permissible.

Clearly, hospitality can amount to real or perceived bribery, and caution should always be exercised. If there is any doubt about the propriety of hospitality, it should not be accepted or offered.

Unfortunately, policy and real events are different, and it is not unknown for a purported -star lunch, with all its potential

6 POLICY STATEMENT

The University is fully committed to ensuring that there is a safe and confidential method