

Anti-Bribery Policy

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Audit Committee	28 September 2022	30 September 2025

Anti-Bribery Policy

The University is committed to being an honest and ethical institution, seeking to conduct its business to the highest standards of integrity and objectivity. The University is committed to preventing bribery and has developed this Policy (“the Policy”) as part of its measures to minimise the risk and impact of corrupt activity.

Who needs to know about the Policy

- The Governing Body
- Nominative Bodies
- The Vice-Chancellor and Principal/SMT
- Senior Leadership Group
- Staff/Workers
- Contractors
- Collaborative Bodies
- Students’ Union

Purpose of the Policy

The purpose of the Policy is to

- set out the University’s corporate stance on bribery;
- explain how and where bribery may occur; and
- set out the anti-bribery responsibilities for individuals and bodies working for or on behalf of the University, especially in situations with a particular risk of bribery.

Contacts

Governance and Legal Services is responsible for:

- Providing advice and assistance;

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- Guidance;
- Accessing training.

Governance and Legal Services is contactable by emailing: glc@canterbury.ac.uk.

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Anti-Bribery Policy

1. Introduction

- 1.1. Canterbury Christ Church University ('the University') is committed to fair, ethical, and honest standards of conduct, wherever and with whomever it operates, with effective systems implemented and enforced to counter bribery and corruption.
- 1.2. The University's approach is to create an anti-bribery culture, prevent incidents, monitor where there is a higher risk of bribery, and act in the event of bribery allegations.
- 1.3. The University will consistently uphold all laws relating to anti-bribery and corruption in all the jurisdictions in which it operates. The University is bound by the Bribery Act 2010 regarding its conduct at home and abroad. The University will co-operate fully with any investigation concerning allegations of criminal actions.
- 1.4. The University will identify and control the risks faced concerning bribery. Schools and Departments must regularly review and monitor the bribery risks faced by market, sector, and location. Where the activity takes place abroad, the relevant School or Department will assess each country proportionate to the activity undertaken. Schools and Departments must undertake due diligence checks to assess the risks relating to bribery if the University deems a project or activity to be high risk.
- 1.5. Independent of any criminal investigative action, breaches of the Policy may constitute a staff disciplinary offence. It may be subject to investigation under the University's disciplinary procedures, potentially resulting in dismissal for misconduct or gross misconduct. The University may terminate its relationship with other individuals, partnerships (domestic and international) and organisations working on its behalf if they breach the Policy.
- 1.6. The University will include appropriate provisions requiring third-party contractors to comply with Anti-Bribery legislation in all agreements.
- 1.7. The University strongly encourages the immediate reporting of concerns. It is a core part of the University's commitment to ethical and legal compliance.
- 1.8. The University is committed to ensuring that individuals making reports in good faith do not suffer detriment, even if mistaken. The University is also committed to ensuring

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that there should be no detrimental treatment for individuals who refuse to participate in bribery. Detrimental treatment includes dismissal, disciplinary action, threats, or other unfavourable treatment.

2. Scope of the Policy

- 2.1. The Policy applies to all persons working for the University or on its behalf. It includes Governors, employees, directors, officers, associates, agency workers, seconded workers, volunteers, agents, contractors, external consultants, third-party representatives, business partners (including joint venture and consortium), sponsors, or any other person associated with the University.
- 2.2. The Policy applies to all University campuses and locations and all jurisdictions in which the University undertakes its activities.
- 2.3. Any person within the scope of section 2.1 is referred to in this document as “You.”

3. Governance

- 3.1. The University will review the Policy every three years or following changes in legislation, significant organisational change, audit, or an investigation into its operation. It needs reading in conjunction with the [Statement on the Prevention, Detection and Investigation of Fraud, Bribery, Irregularities and Corrupt Practices](#).
- 3.2. The following University procedures and guidance support the Policy's implementation:
 - [Financial Regulations](#) and [Financial Procedures](#); and
 - [Staff code](#) (especially sections 25–27: Raising Matters of Concern; Bribery; and Gifts & Hospitality)
- 3.3. Implementation of the Policy took place following discussion with the Joint Negotiating & Consultation Committee and relevant unions. It is not part of any employee's employment contract and is amendable at any time.
- 3.4. The Audit Committee of the Governing Body has oversight of the Policy, ensuring that appropriate measures are in place for its implementation, monitoring and review.
- 3.5. The University reports annually to the Audit Committee on actions to mitigate the risk of bribery and the results of any investigations. The Audit Committee will make a statement regarding its oversight in its annual report to the Governing Body. The

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University's management is responsible for ensuring those reporting to them understand and comply with this Policy and receive adequate and regular training.

4. What is bribery?

4.1. Bribery means:

- Offering, promising, giving or requesting, agreeing to receive, or accepting any financial or other advantages that induce the recipient or any other person to act improperly in the performance of their functions; or
- to reward them for acting improperly;
- where the recipient would act improperly by accepting the advantage; or
- the offering, promising, or giving of a bribe to a foreign public official to influence the recipient in the performance of the public official's functions, to obtain or retain business or a business advantage.

4.2. An advantage includes money, gifts, loans, fees, hospitality, services, discounts, the award of a contract or anything else of value.

4.3. A person acts improperly when they

- act illegally, unethically, contrary to an expectation of good faith or impartiality; or
- abuse a position of trust.

4.4. The improper acts may be related to any business or professional activities, public functions, acts in the course of employment, or other activities by or on behalf of any organisation.

4.5. You must disregard any local custom or practice outside the UK unless allowed or mandated by the written law applicable to the country where the function or activity occurs.

4.6. The following are examples of bribery, but the list is not exhaustive:

- offering excessive hospitality to secure a commercial research project or grant;
- offering excessive hospitality to secure a commercial research project or grant;
- receiving concert tickets on the understanding that an individual will, as a result, commission business or award or renew an existing contract;
- offering a partner of a member of staff a free long-haul flight to ensure a tender bid receives preferential treatment;

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- using an overseas intermediary to pay a suggested ‘fee’ for expedited approval by a foreign official of a proposed programme is run locally by the University; or
- receiving a substantial donation offered to the University for a research project by the relative of a rejected applicant should there be a reversal of the decision.

4.7. The Annex sets out an illustrative list of “red flag” situations which are very likely to involve bribery.

5. Your Anti-Bribery Responsibilities

5.1. You are prohibited absolutely from:

- engaging in bribery, whether giving or receiving bribes; and
- otherwise engaging in any activity that might lead to a breach of this Policy and supporting procedures.

5.2. You must promptly report to Governance and Legal Services (glis@canterbury.ac.uk) should you

- receive the offer of a bribe or request to make one, or
- believe or suspect any bribery or other breach of this Policy.

5.3. Should any Governance and Legal Services member be the subject of the concern, the report is to the Director of Finance (director.finance@canterbury.ac.uk).

5.4. You must communicate the University’s zero-tolerance approach to bribery to all suppliers, contractors, and business partners at the outset of its business relationship with them and throughout the relationship as appropriate.

5.5. You can seek advice before making a report or deciding upon a particular course of action by contacting Governance and Legal Services (GLS) (glis@canterbury.ac.uk). GLS will provide confidential advice or clarification.

5.6. If you believe you suffered detrimental treatment, you should inform the University Solicitor immediately. If the matter is unremedied and you are an employee, you can raise it using the University’s Grievance Procedure.

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6. Your additional Anti-Bribery Responsibilities in Areas of Particular Risk

Certain areas of the University's work and business relationships are subject to particular risks and require scrutiny. You must take additional steps if involved in the following areas.

Hospitality and Gifts

- 6.1. 'Hospitality' means gifts, entertainments or perks offered or received because of, or in connection with, employment with the University. The hospitality might be for members of staff, agents and intermediaries or their families or friends. It might include the offer or receipt of a meal, tickets to an event, or an individual present. These provisions apply where hospitality is given (or proposed to be given) and where it is received (or offered).
- 6.2. Depending on the circumstances and value, there is a risk hospitality might constitute bribery. The motive behind the hospitality is vital, as there is no point at which hospitality is too small to amount to bribery at law. It is bribery if the purpose of providing the hospitality is to gain an improper business or other advantage or intended to affect the recipient's independence.
- 6.3. Transparency is essential in ensuring hospitality does not cross the line into bribery. Where hospitality offered or received (whether accepted or not) might exceed £50 in overall value, you must make an entry into the University's hospitality register. The overall value is an aggregate of all hospitality offered or received by an individual involving the same instance within a 30-day period.
- 6.4. The reporting requirements do not extend to formal events organised by the University or to legitimate business expenses incurred and personally claimed in writing by the individual related only to that individual (for instance, overnight accommodation or meals) concerning duties performed for, on behalf of or arising from a connection with the University.

Facilitation payments

- 6.5. Facilitation payments are typically small, unofficial payments made to government officials to secure or expedite a routine service to which there is already entitlement. For example, an official may request a payment to expedite the issuing of a visa. Similarly, individuals within an official overseas regulatory authority may require a payment to provide regulatory approval for any joint educational arrangements the University maintains with overseas organisations.

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- 6.6. It is unlawful to offer, make, demand, or accept facilitation payments anywhere in the world. You are prohibited from offering, making, demanding, or receiving any facilitation payment.
- 6.7. Those working for the University are obliged to recognise a facilitation payment. You must consider the purpose of the payment and whether it appears relevant and proportionate to the matter in hand. You must distinguish between properly payable fees and disguised requests for facilitation payments. If in doubt, you can request clarification from Governance and Legal Services (gls@canterbury.ac.uk).
- 6.8. If you have any suspicions or concerns concerning the payment, you neither make nor accept it, but you should report the attempt.
- 6.9. The University accepts that you may face a request outside the University for such payments in circumstances of threat or coercion, including an actual or implied threat to your safety. You need to use common sense in deciding whether to make a payment in such circumstances. The University will not penalise payments made in good faith, provided you immediately report the event in writing. However, the University will take disciplinary action or reference to authorities if you make a false declaration of duress to evade responsibility for making or accepting an unlawful facilitation payment.

Intermediaries and agents

- 6.10. Before any intermediary or agent in a high-risk location or business sector is engaged, appropriate due diligence, including both financial and broader background checks, is required. The jurisdiction of the base and operation of the intermediary or agent will be relevant. Certain jurisdictions present a heightened bribery risk. Should the proposed and properly approved intermediary operate in a jurisdiction where bribery is prevalent or endemic, you should include enhanced contractual requirements for the intermediary or agent. The purpose is to establish and apply anti-bribery measures equivalent to those applying to the University.
- 6.11. Enhanced due diligence, risk and financial controls should be proportionate to the scale of the arrangements.

Joint Ventures

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6.12. With joint ventures and contracts, the University might be potentially liable for any bribery or corruption committed by a joint venture party or a contractor contributing to the University's commercial or financial benefit domestically and internationally.

6.13. Before committing the University to any contract, you must conduct due diligence concerning anti-bribery arrangements on any prospective joint venture party or contractor.

6.14. Through exercising due diligence, it may be necessary to require the joint venture party or contractor to

- agree to equivalent anti-bribery measures; and/or
- indemnify the University for any bribery or corruption risk; and/or
- institute appropriate monitoring arrangements.

6.15. Existing joint venture partners and contractors may, on review, be made subject to greater operational scrutiny.

Donations and Sponsorship

6.16. As a charity, the University may receive donations and sponsorship or offers of donations sponsorship. Donations are subject to the University's [Financial Procedure on the Acceptance of Donations and Gifts Due Diligence](#).

6.17. To avoid any risk of bribery, those dealing with donors and sponsors, or potential donors and sponsors must remain vigilant and abide by the terms of the Policy and supporting procedures. It includes donations and sponsorship from existing and potential suppliers and contractors.

6.18. In all cases, you must undertake due diligence concerning such offers. You must report, and receive feedback on, the due diligence outcomes to your Senior Management Team member before accepting the offer.

6.19. There are circumstances when it is not in the University's best interests for donors and sponsors to extend their influence through hospitality, sponsorship or marketing of their products or services directly or indirectly. You must refuse donations where:

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- due diligence indicates that the donation arises from money laundering or illegal activities, and acceptance may give respectability to those whose reputation is dubious;
- there is a lack of alignment with University values, and it would damage the University's reputation to accept donations inconsistent with its values; or
- the receipt of donations and sponsorship is likely to damage the University's reputation, a reduction of contracts for University business or donations from other sources.

6.20. Contact Governance and Legal Services (gl@canterbury.ac.uk) should you have any doubt following undertaking due diligence.

7. Action Taken Following Reports of Alleged Bribery

- 7.1. Engagement in bribery or breach of this Policy, including failure to report bribery-related concerns, may require investigation and action taken under the University's Disciplinary Procedure, in addition to any criminal investigation. The University will investigate allegations of bribery raised by employees or others.
- 7.2. On receiving notice of the concern, the University Solicitor or Director of Finance will follow the [Fraud and Anti-Bribery Response Plan](#) and notify the Vice-Chancellor.

8. Freedom of Information and Data Protection

- 8.1. The information recorded in the University's gifts and hospitality registers is potentially subject to disclosure in response to requests under the Freedom of Information Act 2000. The University will consider whether any relevant exemptions to disclosure apply before responding to requests.
- 8.2. Processing personal data provided in compliance with this Policy and procedures follow the requirements of the UK GDPR and Data Protection Act 2018.

9. Training and Communication

- 9.1. You must communicate the University's zero-tolerance approach to bribery to all suppliers, contractors, and business partners at the outset of our business relationship with them and as appropriate after that.
- 9.2. The foundation for the Policy is the effective communication of the University's core values and supporting policies. Employees, including temporary and sessional staff,

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must understand the Anti-Bribery Policy. It will enable it to become embedded in the work of the University.

- 9.3. Training and briefing are essential in implementing the Policy. The University will provide training to all staff as part of its mandatory training and induction.
- 9.4. There will be targeting of training where risk assessments suggest knowledge of how to comply with the Bribery Act needs enhancing.
- 9.5. The University will provide anti-bribery training in sensitive areas with a potential risk of staff facing bribery or corruption during work activities.
- 9.6. There will be proportionate accompanying procedures and guidance to assist implementation of this Policy. The objective is to make the guidelines clear, practical, and accessible to ensure effective implementation and enforcement of the Policy. They will help to assess the risks, taking account of the nature, scale and complexity of the activities involved.

Annex

‘Red Flags’

The following is a list of potential situations in which increased vigilance in respect of bribery should be exercised. The encountering of these represents a ‘red flag’ for the University and indicates action should be taken. The list is illustrative and not exhaustive.

Should you encounter any of the following concerning a party with whom the University is involved, or it is proposed the University be involved, you must report this promptly following the procedures set out in the Policy.

- Examples of ‘red flag’ situations include:
 - you are offered an unusually generous gift or offered lavish hospitality by a third party;
 - you become aware that a third party engages, or was accused of engaging, in improper business practices;
 - you learn that a third party has a reputation for paying bribes, or requiring that bribes be paid to them, or has a “special relationship” with foreign government officials;
 - a third party insists on receiving a commission or payment before committing to signing up to a contract with the University or conducting a government function;
 - a third party requests or requires payment in cash;
 - a third-party refuses to sign a formal commission or fee arrangement, issue an invoice or provide a receipt for a payment made;
 - a third-party requests that payment is made to a country or geographic location different from where the third party resides or conducts business;
 - a third party requests an unexplained additional fee or commission to facilitate a service;
 - a third party demands lavish entertainment or gifts before commencing or continuing contractual negotiations or provision of services;
 - a third-party requests that a payment is made to “overlook” potential legal violations;
 - you receive an invoice from a third party that appears to be non-standard or customised;
 - a third party insists on the use of side letters or refuses to put terms agreed into writing;
 - you notice an invoice for a commission or fee payment appearing large in comparison with the service provided;

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- a third-party requests that you provide employment or other advantage to a friend or relative;
- a third party requests or requires the use of an agent, intermediary, consultant, distributor, or supplier not typically used or known to the University.

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Document Manager	Governance and Legal Services Assistant
Related University Policies	Financial Regulations
Related University Policies and Procedures	Statement on the Prevention, Detection and Investigation of Fraud, Bribery, Irregularities and Corrupt Practices The Whistle Blowing Policy The Financial Regulations Fraud and Anti-Bribery Response Plan
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