

Anti-Bribery Policy

March 2026

APPROVAL HISTORY

Approval	Details
Approved by	Chief Finance Officer
Monitored by	Chief Finance Officer
Executive Owner	Chief Finance Officer
Operational Owner	Head of Financial Reporting and Compliance
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AMENDMENT HISTORY

Version	Author	Summary of Amendments	Amendment Approval Date
4.0	Louise Walsh - Financial Accountant	- Amended reference to Secretariat & Registrar's Directorate to Finance & Planning Directorate - Amended Reference to Secretary and Registrar to Chief Finance and Planning Officer	07.03.18
5.0	Louise Walsh – Head of Financial reporting and Compliance	- Updated links to other documents - Made some minor wording amendments to make the document clearer - Made some changes based on recommendations made by SHU Legal in Section 5 around Due Diligence and Section 9 around documenting / evidencing risk assessment	11.02.21
6.0	Louise Walsh – Head of Financial Reporting and Compliance	- Changed reference to University's Disciplinary Procedure to Problem Resolution Framework and updated the link. - Clarified the position around contracts with third parties in Section 5 and what is appropriate and proportionate in terms of getting comfort about anti-bribery compliance from suppliers.	10.03.22

7.0	Louise Walsh – Head of Financial Reporting and Compliance	- Updated references to latest version of the Financial Regulations (July 2022). - Amended reference to Chief Finance and Planning Officer to Chief Finance Officer.	09.03.23
8.0	Louise Walsh – Head of Financial Reporting and Compliance	- Update to include students in list of persons that the policy applies to and reflect that in the body of the policy in line with the Anti-corruption policy and Fraud and Corruption Response Plan. - Updated to include 'debarment list' under new Procurement Act 2023 (section 4). - Update references to Speak Out (whistleblowing) Policy, previously Public Interest Disclosure Policy. - Corrected links.	15.02.24
9.0	Helen Damon – Head of Financial Reporting and Compliance	Update to include reformed corporate criminal liability for economic crime under the Economic Crime and Corporate Transparency Act 2023 (section 2)	13.02.25
10.0	Helen Damon – Head of Financial Reporting and Compliance	- Update to debarment list for Procurement Act 2023 - Update to revised Policy for Claiming Travel, Hospitality and Other Business Expenses (staff expenses)	05.03.26

Compliance with the Anti-Bribery Policy is compulsory. The policy applies to:

- members of the University Board of Governors and other Committees
- staff directly or deemed employed by the University and /or subsidiary or associated companies
- Staff directly or indirectly employed by overseas offices and branches;
- associate lecturers;
- agency staff working for the University;
- any other third parties who work on delivering University services and are paid through a contract for services.
- all enrolled and registered students.

A member of staff, or other person connected with the University, who contravenes the Bribery Act 2010 will be referred to the [Problem Resolution Framework](#) which may result in disciplinary action. In addition, they may face personal legal consequence including criminal proceedings leading to fines and / or imprisonment.

Members of staff must ensure that they understand the requirements and complete the appropriate training and development sessions offered by the Finance and Procurement Directorate.

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1 Introduction

It is the University's policy to conduct its business in an honest way and to reject the use of corrupt practices or acts of bribery to obtain an unfair advantage.

The University is committed to the highest level of ethical standards and sound governance arrangements and sets high standards of impartiality, integrity and objectivity in relation to the stewardship of public and private funds for which it is responsible and the management of its activities. This is defined within 'Code of Behaviour' referred to in the University [Financial Regulations](#), 'Conflicts of Interest'. This is not just a cultural commitment on the part of the University, it is a legal requirement.

The UK Bribery Act 2010 applies to all activities no matter where they are carried out in the world. This policy therefore applies to **ALL** the University's activities worldwide, whatever the local law, practice or custom may be.

It is the responsibility of all members of staff, governors and others directly involved in delivering University business activities or acting on the University's behalf to:

- comply with all relevant legislation countering bribery and corruption, in particular the Bribery Act 2010;
- take all action and comply with all prohibitions required by this policy and its associated procedures;
- identify and report bribery situations where there is a suspicion or risk of bribery ;
- consider their related duties to make appropriate disclosures.

2 What is Bribery?

Bribery can be defined as *"giving someone a financial or other advantage, to encourage that person to perform their functions or activities improperly, or to reward that person for having already done so."*

[The Bribery Act 2010](#) outlaws both giving (active bribery) and receiving bribes (passive bribery) and could extend to cover seeking to influence a decision maker by giving some kind of extra benefit which amounts to more than can legitimately be offered as part of a tender process.

The Act creates four categories of offence that address the following:

- paying or offering a bribe;
- receiving or requesting a bribe;
- bribing a foreign public official;
- [the corporate offence of] failing to prevent bribery.

The [Economic Crime and Corporate Transparency Act 2023](#) has reformed corporate criminal liability for economic crime and the scope of corporate criminal offences which do not require the application of the legal principle known as the '**identification doctrine**' (requiring that a directing mind and will of the organisation, such as a particular individual or director, intended to commit the offence). Instead, an organisation will be guilty of an offence if a senior manager, acting within the actual or apparent scope of their authority, commits an economic crime. In addition to any sentence imposed on the individual, the organisation will receive a criminal conviction and potentially unlimited fine.

Some potential risk scenarios are highlighted in Appendix A.

3 Policy

The University is committed to carrying out its academic and business functions in an honest and ethical manner and to observing the provisions of the Bribery Act 2010, in respect of its conduct both at home and overseas.

The Policy applies to:

- members of the University Board of Governors and other Committees
- staff directly or deemed employed by the University and/or subsidiary or associated companies;
- staff directly or indirectly employed by overseas offices and branches;
- associate lecturers;
- agency staff working for the University;
- any other third parties who work on delivering University services and are paid through a contract for services;
- all enrolled and registered students.

The University does not wish to stifle the development of good working relationships with suppliers, agents, contractors or officials. However, any relations must be transparent, gifts and hospitality proportionate and auditable. The University expects its business partners, agents, suppliers and contractors to act with integrity and without any actions that may be considered as an offence within the meaning of [The Bribery Act 2010](#).

Any person to whom this policy applies must not:

- offer or make a bribe, unauthorised payment or inducement of any kind to anyone;
- solicit business by offering a bribe, unauthorised payment or inducement to a third party;
- accept any kind of bribe, unauthorised payment or inducement that would not be authorised by the University in the normal course of events.

Any person to whom this policy applies must:

- refuse any bribe, inducement or unauthorised payment that is offered. This should be done in a clear manner that could not lead to any misunderstanding.
- report any acts of suspected bribery in accordance with the [Fraud and Corruption Response Plan](#).
- if there are concerns that mean the process outlined in the Fraud and Corruption Response Plan cannot be followed, then the person must consider escalating the matter through the [Speak Out \(Whistleblowing\) Policy](#).

4 Penalties

While the University's disciplinary procedures will be invoked as necessary, there are substantial legal penalties for bribery offences.

The offences of bribing another person, being bribed and bribing a foreign public official are punishable on indictment either by an **unlimited fine, imprisonment of up to ten years or both**.

The corporate offence of failure to prevent bribery is punishable on indictment by an **unlimited fine**.

Businesses that have been convicted of economic crimes including bribery, corruption and fraud could find themselves **debarred** from tendering for public-sector contracts for up to 5 years from the date of conviction.

Under the new Procurement Act 2023, operationally in force from 4 February 2024, the Government will operate a central "**debarment list**". The debarment list has been in operation since February 2025 but as yet, no suppliers have been added to it. Suppliers convicted of (amongst others) economic crimes who appear on the list must be excluded from all public procurement opportunities until their name is removed.

A business may also be damaged by **adverse publicity** if it is prosecuted for an offence.

5 Status of the policy

The Anti-Bribery Policy is part of the University's integrated financial governance framework. This includes:

- [Financial Regulations](#);
- [Anti-Corruption Policy](#).
- [Fraud and Corruption Response Plan](#);
- [Speak Out \(Whistleblowing\) Policy](#).

The Chief Finance Officer leads on the University's compliance with the Bribery Act 2010 and regular reports are received by the Audit and Risk Committee. The following activities will take place to support this work:

- Regular risk assessments of University activities to understand the inherent risks arising (both internal and external) and how these may be mitigated;
- Training and development activities are developed and delivered as appropriate to different needs - this is informed by the risk assessment;
- Wherever possible, contracts with third parties contain reference to the Bribery Act 2010 and prohibit conduct which could fall within the scope of the Act, through the use of the University's Terms and Conditions (T&Cs), or negotiating changes to the supplier's T&Cs, where they are being used and do not include such a clause;
- When compliance checking is carried out for contracts, following the release of Invitations to Tender, due diligence around suppliers' compliance with the Bribery Act 2010 and other anti-corruption legislation is carried out. Once a contract is in place, the University's right to ask for evidence of compliance is written into the University T&Cs but may not be possible where the supplier's T&Cs are being used. This right is exercised proportionately, on a case by case basis, depending on whether there are sufficient justifiable concerns of bribery, or the risk of bribery taking place, to merit further investigation. When contracting on the supplier's terms, the University still presses for evidence of compliance where sufficient, justifiable concerns are identified.
- A Bribery Act 2010 Briefing Note for Associates of the University (partners, agents etc.) is published on the [website](#) along with other anti-corruption policies.
- The policy will be monitored and reviewed at least annually and amended in light of emerging practice, case law or guidance.

6 Gifts and hospitality

This policy does not prohibit normal and appropriate hospitality (given and received) to, or from, third parties. However, gifts, hospitality and donations will be bribes if they are given or received with the intention of influencing business decisions.

When giving or receiving gifts and hospitality, you should consider whether the following requirements are met:

- it is not made with the intention of influencing a third party to obtain or retain business or a business advantage, or to reward the provision or retention of business or a business advantage, or in explicit or implicit exchange for favours or benefits;
- it complies with any local law;
- it does not include cash or a cash equivalent (such as gift certificates or vouchers);
- taking into account the reason for the gift, it is of an appropriate type and value and given at an appropriate time; and
- it is given openly, not secretly.

Particular care should be exercised with respect to gifts offered to, or accepted from,

government officials or representatives, or politicians or political parties

It is also important to ensure that any legitimate gift or other benefit received, or given, by University staff or third parties engaged in business on our behalf under a contract for services, is not passed on to those in a position to influence business decisions to the University's advantage, as this could be improper and constitute bribery. If in any doubt you should seek advice from the Chief Finance Officer.

7 What is not acceptable?

It is not acceptable for you (or someone on your behalf) to:

- give, promise to give, or offer, a payment, gift or hospitality with the expectation or hope that a business advantage will be received, or to reward a business advantage already given;
- give, promise to give, or offer, a payment, gift or hospitality to a government official, agent or representative to "facilitate" or expedite a routine procedure;
- accept payment from a third party that you know, or suspect is offered with the expectation that it will obtain a business advantage for them;
- accept a gift or hospitality from a third party if you know or suspect that it is offered or provided with an expectation that a business advantage will be provided by the University in return;
- threaten or retaliate against a colleague or third party who has refused to commit a bribery offence or who has raised concerns under this policy;
- engage in any activity that might lead to a breach of this policy.

8 Facilitation payments

In some countries it is customary practice to make payments or gifts of small value to government officials in order to speed up or facilitate a routine action or process. However, this is not permitted under the Bribery Act 2010 and the University does not, therefore, support or endorse the making or accepting of facilitation payments by staff and anyone carrying out business on its behalf.

If you are asked to make a payment on behalf of the University, you should always be mindful of what the payment is for and whether the amount requested is proportionate to the goods or services provided. You should always ask for a receipt which details the reason for the payment.

In the event that a facilitation payment is being extorted, or if you are forced to pay under duress, you must record the payment and report it without delay to the Chief Finance Officer.

9 Responsibilities

You must ensure that you read, understand and comply with this policy.

The prevention, detection and reporting of bribery and other forms of corruption are the responsibility of all those working for or associated with the University. You are required to avoid any activity that might lead to, or suggest, a breach of this policy.

Effective risk assessment, in order to evaluate and mitigate risk, is an essential element of this policy and the directors / heads of high risk areas across the University will be expected to complete a biennial questionnaire around anti-bribery policies, training and concerns.

Any suspected or actual incidents of bribery must be reported in accordance with the [Fraud and Corruption Response Plan](#).

Any member of staff who breaches this policy will be referred to the [Problem Resolution Framework](#) which may result in disciplinary action.

10 Record Keeping

The University has a duty to monitor that the terms of the Bribery Act 2010 are being observed by members of staff, Governors and other persons associated with the University. The University is required to keep financial records and to have appropriate internal controls in place which will evidence the business reason for making payments to third parties.

You must declare and keep a written record of all hospitality or gifts accepted or offered in accordance with the [Financial Regulations](#), 'Fraud, Corruption and Bribery'.

You must ensure all expenses claims relating to hospitality, gifts or expenses incurred to third parties are submitted in accordance with the [Policy for Claiming Travel, Hospitality and Other Business Expenses](#) and specifically record the reason for the expenditure.

11 Protection

Members of staff 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 will support anyone who raises genuine concerns in good faith under this policy.

The University is committed to ensuring 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. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If you believe that you have suffered any such treatment, you should inform your line manager or the University's HROD Department.

Appendix A - Potential Risk Scenarios

The matters set out below illustrate a number of scenarios which indicate an increased risk of an offence under the Bribery Act 2010 being committed:

- You become aware that a third party engages in, or has been accused of engaging in, improper business practices;
- 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;
- A third party insists on receiving a commission or fee payment before committing to sign up to a contract, or carrying out a government function or process;
- 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;
- 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 unexpected 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;
- A third party requests that you provide employment, a place on a course, or some other advantage to a friend or relative;
- 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 in writing;
- You notice that the University has been invoiced for a commission or fee payment that appears large given the service stated to have been provided;
- 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 the University; and
- You are offered an unusually generous gift or offered lavish hospitality by a third party.