

Anti-Bribery Policy

1. Purpose and Scope

- 1.1 The University is committed to conducting its activities ethically, transparently, and in compliance with UK law. This policy outlines the University's approach to preventing bribery, which includes meeting its obligations under the Bribery Act 2010.
- 1.2 This policy applies to all staff and associated persons including governors, subsidiary companies, contractors, agents, students and third parties acting on behalf of the University, and to all activities undertaken by the University in the UK and internationally.
- 1.3 All staff and associated persons are required to comply with this policy.

2. Definitions

- 2.1 The following definitions are used for the purposes of this Policy:

Bribery is an inducement or reward offered, promised or provided in order to gain any commercial, contractual, regulatory or personal advantage.

Associated Person is anyone performing services for or on behalf of the University.

3. Legal Framework: Bribery Act 2010

- 3.1 The University prohibits offering, giving, receiving, or soliciting a bribe, facilitation payments, and bribes via third parties. There are four main offences covered by the Bribery Act 2010:
 - (i) Active Bribery (promising and/or offering to bribe another)
 - (ii) Passive Bribery (accepting/requesting a bribe)
 - (iii) Bribery of a foreign public official
 - (iv) Failure to prevent Bribery (committed by an organisation that fails to prevent bribery by any 'person' associated with it).
- 3.2 No member of staff or associated person is permitted to engage in any activity that constitutes bribery.

4. Responsibilities

- 4.1 It is a corporate offence if an organisation fails to take reasonable steps to prevent bribery. Organisations must demonstrate that they have adequate procedures for

preventing bribery. In accordance with this requirement, staff, associated persons and governors have the following responsibilities:

All Staff and Associated Persons should:

- (i) Read, understand, and comply with the Anti-Bribery Policy.
- (ii) Avoid offering, soliciting, or accepting bribes.
- (iii) Report any suspicions of bribery promptly to the University Secretary or via the Whistleblowing Procedure.
- (iv) Uphold ethical standards and cooperate with any investigation requirements.

All Staff and Associated Persons have a duty to report any instances of suspected or actual bribery.

Line managers should:

- (i) Promote awareness of the Anti-Bribery Policy amongst their staff.
- (ii) Ensure their staff complete any relevant training and understand reporting procedures.
- (iii) Identify, assess and monitor any local risks and escalate concerns appropriately.
- (iv) Support implementation of appropriate risk management and preventative controls in their areas.

The University Secretary should:

- (i) Oversee the development, implementation, and review of the Anti-Bribery Policy.
- (ii) Ensure alignment with legislation and sector best practice.
- (iii) Coordinate responses to reported breaches; including liaison with other areas of the University and reporting to auditors and appropriate legal and regulatory bodies.

The Senior Leadership Team and Board of Governors should:

- (i) Demonstrate top-level commitment to ethical conduct by reinforcing a culture of integrity and compliance with the Anti-Bribery Policy.
- (ii) Endorse and resource anti-bribery measures.
- (iii) Ensure risk assessments are conducted and acted upon.

The Audit and Risk Assurance Committee (ARAC) should:

- (i) Monitor compliance with the Anti-Bribery Policy.
- (ii) Review any internal audit findings and risk assessments.
- (iii) Advise on improvements to controls and procedures.
- (iv) Ensure accountability and transparency in governance.

5. Gifts and Hospitality

5.1 It is not the intention of the Policy to prevent the following activities:

- (i) Normal and appropriate hospitality;
- (ii) Giving and receiving of modest gifts.

- 5.2 Such hospitality or gifts must be proportionate, reasonable and made in good faith and must not place any expectation on the recipient to reciprocate either in like or by performing, or failing to perform, any other task in return.
- 5.3 This Anti-Bribery Policy must be read in conjunction with the Gift Acceptance Policy which provides guidance and rules on the acceptance of gifts.

6. Reporting and Investigation

- 6.1 If you become aware of any activity or conduct which you suspect may involve bribery then you should report it to the University Secretary at the earliest opportunity. You can also use the University's Whistleblowing Policy, which offers confidentiality and protection to those who raise legitimate concerns. The Whistleblowing Policy can be found at: [Whistleblowing Policy](#)

7. Monitoring and Review

- 7.1 This policy will be formally reviewed every three years or earlier if required. Any material instances of non-compliance will be reported to the Audit and Risk Assurance Committee.

8. Consequences

- 8.1 Any breach of this policy may constitute a serious disciplinary, contractual and/or criminal matter for the individual concerned.
- 8.2 The University may terminate the contracts of associated persons and may report breaches to relevant legal and regulatory authorities. Appendix A lists the possible consequences for breach of the legislation.

9. Further Information

- 9.1 Further information on this policy may be obtained from the University Secretary. Some Frequently Asked Questions (FAQs) are provided at Appendix B

Effective date: November 2025
Next review date: November 2028

CONSEQUENCES OF BREACHING ANTI-BRIBERY LEGISLATION

University Consequences:

- Unlimited fines
- Reputational damage
- Increased regulatory scrutiny
- Potential exclusion from public contracts

Staff/Associated Persons Consequences:

- Up to 10 years' imprisonment
- Unlimited personal fines
- Disciplinary action (which could include dismissal)
- Contract termination

FREQUENTLY ASKED QUESTIONS

1. Who does the Anti-Bribery Policy apply to?

It applies to all University staff, students, governors, contractors, consultants, agents, subsidiaries, and any other persons acting on behalf of Kingston University, both in the UK and overseas.

2. What is considered a bribe?

A bribe is any financial or other advantage offered, promised, given, requested, or received to induce or reward improper performance of a function or activity.

3. Are facilitation payments allowed?

No. Facilitation payments - small unofficial payments to expedite routine actions - are illegal under UK law and prohibited by the University.

6. What should I do if I suspect bribery?

Report concerns to the University Secretary. You can also use the Whistleblowing Policy to report concerns confidentially.

7. Will I be protected if I report wrongdoing?

Yes. The University is committed to protecting individuals who report legitimate concerns from retaliation or detrimental treatment. You can also use the Whistleblowing Policy to report concerns confidentially.

8. What are the consequences of breaching the policy or relevant legislation?

Consequences may include disciplinary action, dismissal, contract termination, criminal prosecution, and fines or imprisonment.

9. Is hospitality or gift-giving acceptable?

Yes, but only if it is modest, proportionate, given in good faith and without expectation of personal reciprocation. All gifts and hospitality must comply with the University's Gift Acceptance Policy.

10. What should I do if I am unsure about anything in this Policy or how I should interpret it?

Contact the University Secretary.