

Anti-corruption and Bribery Policy

Version	1.0
Date last updated:	September 2025
Next update:	September 2026
Category	School Regulations
Document Owner:	CEO
Publication:	Public

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1. Policy Statement

- 1.1. The School of Professional Studies (SPS) is committed to conducting all of its activities with honesty, integrity, and transparency.
- 1.2. SPS adopts a zero-tolerance approach to bribery and corruption and is dedicated to ensuring that all operations and relationships are carried out in a professional, fair, and ethical manner. We will implement, maintain, and enforce effective procedures designed to prevent, detect, and address bribery and corrupt practices.
- 1.3. SPS will comply with all applicable laws and regulations relating to the prevention of bribery and corruption. This includes adherence to the requirements of the UK Bribery Act 2010, which governs our conduct both within the United Kingdom and in any international activities as well as fraud legislation and public interest governance principles.

2. Purpose

- 2.1. The purpose of this policy is to:
 - define the responsibilities of SPS and all individuals acting on its behalf in preventing, identifying, and addressing bribery and corruption; and
 - provide clear guidance on how to recognise, avoid, and respond to potential bribery and corruption risks
- 2.2. This policy does not form part of any contract of employment or any contract for services, and SPS reserves the right to amend or withdraw it at any time.
- 2.3. Bribery and corruption may also constitute fraud and financial misconduct and may be addressed under SPS financial and disciplinary procedures.

3. Applicability

- 3.1. This policy applies to all individuals working for SPS or on our behalf in any capacity, including governors, trustees, committee members, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives and business partners, sponsors, or any other person associated with us, wherever found.

4. Governance and Responsibilities

- 4.1. The Governing Body has overall responsibility for ensuring that SPS maintains effective systems and controls to prevent bribery and corruption.

- 4.2. The CEO has operational responsibility for implementing this policy and ensuring that appropriate procedures, controls, and reporting arrangements are in place.
- 4.3. The Quality Manager is responsible for:
- overseeing the day-to-day implementation of this policy;
 - maintaining records of reported concerns and outcomes;
 - supporting staff in understanding and applying this policy; and
 - monitoring compliance and reporting significant concerns to senior management and the Governing Body where appropriate.
- 4.4. Managers at all levels are responsible for ensuring that individuals reporting to them understand and comply with this policy and receive appropriate guidance and support.
- 4.5. All individuals working for or on behalf of SPS are responsible for:
- reading, understanding, and complying with this policy
 - avoiding any activity that may lead to bribery or corruption
 - reporting concerns promptly in accordance with this policy

5. Definitions

- 5.1. ***Bribery*** - offering, promising, giving, requesting, or accepting an advantage (financial or otherwise) to influence a decision or gain an improper benefit
- 5.2. ***Corruption*** - the abuse of entrusted power or position for private gain. Examples of this can include:

Offering a bribe: You offer a potential client tickets to a major sporting event, but only if they agree to do business with us. This would be an offence as you are making the offer to gain a commercial and contractual advantage. We may also be found to have committed an offence because the offer has been made to obtain business for us. It may also be an offence for the potential client to accept your offer.

Receiving a bribe: A supplier gives your nephew a job but makes it clear that in return they expect you to use your influence in our organisation to ensure we continue to do business with them. It is an offence for a supplier to make such an offer. It would be an offence for you to accept the offer as you would be doing so to gain a personal advantage.

Bribing a public official: You arrange for the business to pay an additional "facilitation" payment to a public official to speed up an administrative process, such as clearing of goods

through customs. The offence of bribing a foreign public official is committed as soon as the offer is made. This is because it is made to gain a business advantage for us.

Facilitation payments, also known as "back-handers" or "grease payments", are typically small, unofficial payments made to secure or expedite a routine or necessary action (for example by a government official). They are not common in the UK but are common in some other areas.

5.3. ***Kickbacks***: typically payments made in return for a business favour or advantage.

'Third party' means any individual or organisation you meet during your time working for us, and includes actual and potential clients, customers, suppliers, distributors, business contacts, agents, advisers, and government and public bodies, including their advisors, representatives and officials, politicians and political parties.

6. Identifying risks of bribery and corruption

6.1. SPS has identified a number of areas where there is an increased risk of bribery and corruption. These include, but are not limited to:

- attempts to improperly influence academic decisions, including assessment outcomes and admissions processes
- the offering or acceptance of referral fees or inducements by third parties, including those relating to student recruitment
- attempts to interfere with or unduly influence disciplinary or complaints procedures

6.2. This list is not exhaustive. Where there is any uncertainty as to whether a particular action or situation may constitute bribery or corruption, individuals should seek guidance from the Quality Manager.

6.3. To mitigate these risks, SPS ensures that relevant staff receive appropriate training and are informed of the procedures for identifying and reporting concerns relating to bribery and corruption.

7. What you must not do

7.1. 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 or accept a gift or hospitality during any commercial negotiations or tender process, if this could be perceived as intended or likely to influence the outcome

- accept a payment, gift or hospitality from a third party that you know, or suspect is offered with the expectation that it will provide a business advantage for them or anyone else in return
- offer or accept a gift to or from government officials or representatives, or politicians or political parties
- threaten or retaliate against another individual who has refused to commit a bribery offence or who has raised concerns under this policy
- engage in any other activity that might lead to a breach of this policy

8. Facilitation payments and kickbacks

- 8.1. SPS does not make, and will not accept, facilitation payments or "kickbacks" of any kind.
- 8.2. You must avoid any activity that might lead to a facilitation payment or kickback being made or accepted by us or on our behalf, or that might suggest that such a payment will be made or accepted.
- 8.3. If you are asked to make a payment on our behalf, you should always be mindful of what the payment is for and whether the amount requested is proportionate to the goods or services provided.
- 8.4. You should always ask for a receipt which details the reason for the payment. If you have any suspicions, concerns or queries regarding a payment, you should raise these with the Quality Manager.

9. Conflicts of Interest

- 9.1. SPS recognises that unmanaged conflicts of interest may increase the risk of bribery, corruption, or improper decision-making.
- 9.2. All staff, governors, contractors, and individuals acting on behalf of SPS must declare any actual, potential, or perceived conflicts of interest that may influence, or appear to influence, their professional judgement or decision-making.
- 9.3. Conflicts of interest must be declared in accordance with the SPS Conflict of Interest Policy and recorded appropriately. Individuals must not participate in decisions where a conflict of interest may compromise impartiality.
- 9.4. Failure to declare a relevant conflict of interest may be treated as a disciplinary matter.

10. Gifts, hospitality and expenses

- 10.1. SPS recognises that reasonable and proportionate hospitality or engagement with third parties may be appropriate where it supports legitimate objectives. This may include:

- establishing and maintaining effective professional relationships
- promoting and safeguarding our reputation
- supporting the appropriate presentation of our educational services and activities

10.2. The giving or receiving of gifts and hospitality is permitted only where all of the following conditions are met:

- it is not offered, promised, or accepted with the intention of influencing a decision, securing an improper advantage, or rewarding such advantage
- it is provided on behalf of SPS and not in a personal capacity
- it does not involve cash or cash equivalents (such as vouchers or gift cards)
- it is appropriate, proportionate, and reasonable in value, taking into account the context, timing, and purpose
- it is given and received transparently and not in a concealed manner
- it complies with all applicable legal and regulatory requirements

10.3. Modest, low-value promotional items (such as branded materials) may be acceptable where they are customary and proportionate.

10.4. The reimbursement of reasonable and genuine expenses incurred by, or on behalf of, third parties (for example, attendance at meetings or events) will not normally constitute bribery, provided such costs are appropriate and proportionate.

10.5. Payments or reimbursements that exceed reasonable business expenses, or which could be perceived as excessive or inappropriate, are not permitted.

10.6. SPS recognises that customs and practices may vary across different regions. However, all decisions relating to gifts, hospitality, or payments must be assessed against a consistent standard of reasonableness, proportionality, and intent. The underlying purpose must always be legitimate and justifiable.

11. Due Diligence and Third Parties

11.1. SPS is committed to undertaking proportionate due diligence on third parties who act on its behalf or who provide services to the organisation.

11.2. Appropriate checks may be carried out before entering into relationships with agents, contractors, consultants, suppliers, recruitment partners, or other third parties. These checks may include:

- verification of identity and legitimacy;

- review of reputation and previous conduct
- assessment of potential bribery or corruption risks
- confirmation that the third party is willing to comply with applicable anti-bribery and corruption requirements.

11.3. Written agreements should include appropriate contractual obligations relating to compliance with anti-bribery and corruption laws and standards where relevant.

12. Donations

12.3. SPS does not make contributions to political parties.

12.4. We will ensure that any charitable donations we may make are legal and ethical under local laws and practices. No donation must be offered or made without the prior approval of the CEO.

13. Record Keeping

13.3. SPS will keep financial records and have appropriate internal controls in place which will evidence the business reason for making payments to third parties.

13.4. You must declare and keep a written record of all hospitality or gifts given or received, which will be subject to managerial review.

13.5. You must submit all expenses claims relating to hospitality, gifts or payments to third parties in accordance with our expenses policy and record the reason for expenditure.

13.6. All accounts, invoices, and other records relating to dealings with third parties including suppliers and customers should be prepared with strict accuracy and completeness. Accounts must not be kept "off-book" to facilitate or conceal improper payments.

14. Raising a concern

14.3. All staff and individuals acting on behalf of SPS are encouraged to raise concerns about any suspected or actual instances of bribery or corruption at the earliest opportunity.

14.4. If an individual is offered a bribe, asked to make a bribe, or becomes aware of or suspects any conduct that may constitute bribery, corruption, or a breach of this policy, they must report it promptly. Reports should be made to a line manager or the Quality Manager, or in accordance with our Whistleblowing Policy.

14.5. Where there is any uncertainty as to whether a particular action or situation may amount to bribery or corruption, individuals should seek guidance from a line manager or the Quality Manager.

Investigation of Concerns

- 14.6. Any concerns raised under this policy will be taken seriously and considered promptly, fairly, and confidentially, so far as reasonably possible.
- 14.7. SPS may carry out an internal investigation where appropriate and may involve external agencies, advisers, or authorities where necessary.
- 14.8. Individuals are expected to cooperate fully with any investigation relating to suspected bribery or corruption.

15. Protection

- 15.3. SPS recognises that individuals may feel concerned about potential consequences when refusing to participate in bribery or corruption, or when raising concerns about suspected wrongdoing. SPS is committed to promoting a culture of openness and will support anyone who raises concerns in good faith under this policy, even where those concerns are ultimately unfounded.
- 15.4. SPS will not tolerate any form of detrimental treatment as a result of an individual refusing to engage in bribery or corruption, or for reporting, in good faith, a suspicion of actual or potential misconduct. Detrimental treatment may include dismissal, disciplinary action, threats, or any other unfavourable treatment connected to raising a concern.

16. Training

- 16.3. Training on this policy forms part of the induction process for all individuals who work for us, and regular training will be provided, as necessary.
- 16.4. Our zero-tolerance approach to bribery and corruption must be communicated to all suppliers, contractors and business partners at the outset of our business relationship with them and as appropriately thereafter.

17. Breaches of this policy

- 17.3. Any member of staff who breaches this policy may be subject to disciplinary action, which could result in dismissal, including for gross misconduct where appropriate.
- 17.4. SPS reserves the right to terminate its relationship with any third party, contractor, or organisation acting on its behalf where a breach of this policy is identified.

18. Potential 'Red Flags'

- 18.3. The following are examples of situations that may indicate a heightened risk of bribery or corruption. This list is not exhaustive, and you should remain alert to any other unusual or suspicious circumstances:

- awareness that a third party is engaged in, or has previously been accused of, unethical or improper practices
- knowledge or suspicion that a third party has a reputation for offering or accepting bribes
- requests for payment of fees, commissions, or incentives in advance of formal agreement or before services are properly contracted
- requests for payments to be made in cash, or reluctance to provide formal documentation such as contracts, invoices, or receipts
- requests for payments to be made to individuals, entities, or accounts in locations unrelated to the third party's normal place of business
- requests for additional or unexpected payments to "facilitate" or expedite services
- demands for excessive hospitality, gifts, or entertainment in connection with decision-making, negotiations, or service delivery
- requests to ignore, conceal, or bypass legal, regulatory, or institutional requirements
- requests to provide employment, admissions advantages, or other benefits to associates, friends, or relatives
- receipt of invoices that appear irregular, inflated, vague, or inconsistent with the services provided
- reluctance to formalise agreed terms in writing, or requests to use informal or side arrangements outside standard procedures
- unusually high fees or commissions that are disproportionate to the services delivered
- insistence on using specific intermediaries, agents, or partners without a clear or legitimate justification
- offers of gifts or hospitality that are excessive, frequent, or disproportionate in value
- offers of donations, sponsorships, or funding linked to favourable treatment of students or applicants
- pressure to alter student records, attendance, or achievement data without proper justification
- attempts to influence procurement decisions for educational services, facilities, or resources
- unusual involvement of third parties in student recruitment or admissions processes without appropriate oversight

- requests to bypass established financial controls, approval processes, or governance procedures

Version History

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Version	Changes	Date	Approved by:
1.0	First Approved Version	September 2025	Governing Body