

BIRMINGHAM CITY UNIVERSITY

Anti-bribery policy

1. Policy context

- 1.1 The University Board of Governors expects all University personnel, including Governors and University staff, to demonstrate honesty and integrity at all times; and to exercise high standards of professionalism and ethical conduct in all of their activities. The University also expects its students, partners, advisors, clients, customers, suppliers, contractors, consultants and all other stakeholders to adopt the same standards. In the event that an organisation or individual is unclear as to whether this policy applies, they should operate on the basis that it does apply.
- 1.2 Bribery occurs when someone offers, promises, seeks, or accepts a payment, gift or favour that influences a business outcome or rewards someone for acting improperly. In the University context a business outcome also includes any academic outcome.
- 1.3 Bribes can take many forms, such as money, gifts, loans, fees, credit, hospitality, services, discounts, award of contracts or any other advantage or benefit.
- 1.4 The University has a zero-tolerance approach to bribery or any other form of corrupt or dishonest behaviour.
- 1.5 University Personnel will never seek, accept or give a bribe, facilitation payment, kickback or other improper payment.

2. Our Policy

- 2.1 We will take appropriate steps to ensure that:
 1. We do not offer, promise, give, accept or demand a bribe or other undue advantage (including excessive gifts and hospitality) in order to obtain or retain business, or gain any other improper advantage. This also includes the provision of academic advantage.
 2. We do not offer, nor give in to demands, to make illicit or illegal payments to agents, public officials (at whatever level), or anybody else with whom we do business. If, however, a member of the University (or third party acting on its behalf) is forced under duress to make a facilitation payment or their personal safety is threatened, the instance should be reported to their Head of Department as soon as possible after the event. The Head of Department should in turn contact the Finance Director or DVC Resources to report the transaction.
 3. We engage and remunerate agents and other third parties only for legitimate services, consistent with the terms of their contract. We will use our best endeavours to ensure that we do not allow others to offer, promise, give, accept or demand a bribe on our behalf.
 4. We promote staff awareness of, and compliance with, University policies against bribery through training programmes, briefings, and appropriate dissemination of our own procedures (including disciplinary procedures) and policies. Particular attention is paid to ensuring that, as part of their induction, all staff are aware of the University's stance on bribery and all other forms of dishonest behaviour.

5. We adopt management control systems that discourage bribery including appropriate procurement procedures and adopt sound financial and tax accounting and auditing practices that seek to prevent it.
6. We raise awareness of the need to combat bribery with our partners and stakeholders by publication of this Policy and (where appropriate) through rigorous systems of contract management.

3. Guidance to staff

- 3.1 Whilst the Board of Governors has overall responsibility for governance within the University, line managers have day to day responsibility for reporting and managing any concerns that arise. If any member of staff has any concerns that an action, or suggested action, may constitute bribery, they should immediately contact their line manager or a member of Directorate or Faculty management team. If they believe that they are being put under duress to accept or condone a bribe, they should seek advice and support immediately. If still uncomfortable or concerned by the actions of others, staff members can make use of the confidential Whistleblowing provision, as outlined in the separate [Whistleblowing Policy](#).

4. Appropriate Steps

- 4.1 The steps which the University will take to comply with this policy will be identified following a risk assessment, and will include:
 - Review and revision, as appropriate, of policies and procedures, particularly in the areas of Human Resources and Finance including procurement;
 - Review and revision, as appropriate, of procedures for establishing and managing contracts;
 - Training and Awareness-raising for Governors and staff.

5. Ethical Principles and Practice

- 5.1 The University has an Ethical Principles and Practice Policy statement and a Policy on the Accepting and Giving of Gifts. The purpose of these policy statement is to provide guidance to individual staff on the ethical framework within which the University seeks to conduct its academic activities; and on the processes that the University uses to ensure compliance with the highest ethical standards.
- 5.2 All activities and practices carried out by the University and its employees must comply with the University's ethical standards as set out in that statement.
- 5.3 This Anti-Bribery Policy complements and is entirely consistent with the Ethical Principles and Practice Policy statement, which can be found on iCity.

Approved by the Audit Committee of the Board of Governors on 16 March & 16 June 2022.