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Cardiff University

Anti-Bribery and Anti-Corruption Policy

1. Context and scope

- 1.1. This policy operates in the context of the Bribery Act 2010, and all other related UK legislation which governs bribery and corruption as well as legislation that amends and revises existing UK legislation.
- 1.2. The policy applies to all members of the University engaged in the course of Cardiff University business. Members by definition include:
 - 1.2.1 All employees, honorary members, students, Council members (“internal members”), and
 - 1.2.2 Agency staff, volunteers, contractors and business partners and third parties who act on behalf or provide services to the University (“external members”).

2. Relationship with existing policies

- 2.1. This policy forms part of the University Financial Regulations. It should be read in conjunction both with the University Financial Regulations and University Financial Procedures.
- 2.2. The following code should also be consulted:

Code of Practice on Public Interest Disclosure (Whistle-blowing):

<https://www.cardiff.ac.uk/public-information/policies-and-procedures/public-interest-disclosure-whistleblowing>

3. Executive Summary

3.1. Statement of Ethics

The University has a zero-tolerance policy towards any behaviour that may constitute bribery and corruption. It is committed to acting professionally, fairly and with integrity, ensuring that it conducts its business in an open, ethical and transparent manner wherever it operates. The prevention, detection and reporting of bribery is the responsibility of all members.

- 3.2. Bribery is a serious criminal offence which can carry serious legal penalties if committed:

- 3.2.1 An individual if convicted can be sentenced to up to 10 years imprisonment and an unlimited fine, and
- 3.2.2 If the University were to be found to have “failed to prevent” bribes being made or received by individuals, it could be subject to unlimited fines, substantial reputational damage and [potential] harm to its ability to compete for certain

public contracts in the future and apply for or receive public funds and charity donations.

- 3.3. Individuals found to have breached this Policy may be held personally liable for their actions and may be subject to appropriate internal disciplinary procedures as well as external legal proceedings.
- 3.4. This policy sets out the University's commitment to monitoring, identifying and managing the risks of bribery. It defines the responsibilities of the University as well as those of all University Members to ensure that the University operates in an anti-bribery environment.
- 3.5. The remaining sections of this policy define bribery and set out the University's obligations under the Bribery Act 2010. As stated above, some areas of this Policy will relate to other existing policies and procedures and when these need to be followed.
- 3.6. Members are required to understand their responsibilities under the Act. Individual responsibilities include participating in mandatory training and reporting or disclosing acts or omissions that might constitute attempts to bribe or be bribed. Each individual is responsible for ensuring they comply with the obligations under the Bribery Act and the requirements of this policy.

4. What is Bribery?

- 4.1. Bribery is defined as giving someone a financial (or other) advantage in order to induce them (or another person) to perform their functions or activities improperly; or to reward that person for having already done so. The bribe can be given directly or indirectly. It does not have to be cash, nor does it have to be received: offering or requesting a bribe is sufficient to contravene the Bribery Act 2010.
- 4.2. For example, bribery can include seeking to influence a decision maker by giving an extra benefit beyond what can legitimately be offered as part of a tender process. It can also include donations made to an institution in order to influence a trustee or official to act in a certain way or make a particular decision.
- 4.3. The Act is not intended to prohibit genuine hospitality or similar business expenditure that is reasonable and proportionate. *Bona fide* hospitality, promotional or other business expenditure in line with the University's Financial Regulations and Procedures and other relevant guidance is permissible.

5. Compliance

- 5.1. Members will be required to participate in mandatory training to have an understanding of the Bribery Act 2010 and are duty bound to recognise and report acts that might constitute an attempt to bribe. Advice and guidance is available from the Assurance Service team in the Strategic Planning and Governance Department.
- 5.2. Members are required to consider the risks they or their areas of activity may face which will help in the recognition, prevention and reporting of bribery.

- 5.3. Members are personally responsible when conducting activities on behalf of the University. It is the individual's responsibility to seek guidance where necessary in order to prevent or detect bribery.
- 5.4. When considering whether to receive or offer gifts or hospitality, members must ensure they comply with the University's Financial Regulations, Procedures and Guidance. If unclear, they should seek guidance. Further details are included below.
- 5.5. Senior Managers must be aware of this policy and are required to promote good practice in their own area of operation, monitoring relevant activity to ensure that the policy is followed.
- 5.6. A risk-based due diligence process should, where appropriate, be undertaken on external members before they are engaged to undertake work on the University's behalf. Guidance regarding this requirement is available by referring to the Bribery Act Working Group Due Diligence Guidance Note [here](#).
- 5.7. Such partners should be made aware of the University's Anti Bribery Act 2010 Policy together with the anti-bribery provisions set out in clause 27 of the University's Standard Conditions of Contract for the Purchase of Goods and/or Services, which can be found here:

http://www.cardiff.ac.uk/_data/assets/word_doc/0016/106333/goods-services.docx

The University's Partners will be required to act in accordance with these provisions. Failure to do so may result in the cessation of their relationship with the University.

6. Responsibilities

- 6.1. The senior officer with overall responsibility for the University's compliance with UK bribery legislation is the Chief Operating Officer.
- 6.2. On behalf of the Chief Operating Officer, the Director of Strategic Planning and Governance ("Designated Officer") is responsible for ensuring that policy, advice, guidance and mandatory training on anti-bribery and corruption is developed and disseminated across the University and for reporting annually to the Governance Committee on compliance with this Policy.
- 6.3. The Governance Committee will receive this report and will review annually and/or as required, the effectiveness of this Policy.
- 6.4. University Executive Board Members are responsible for the promotion of good practice in their own area of operation, monitoring relevant activity to ensure that the policy is followed.
- 6.5. Bribery impact risk assessment forms part of the University's risk management framework. The Chief Operating Officer and PVC Heads of College and their direct reports, the Heads of Schools and Directors of Professional Services, are responsible for assessing the impact on the University if a conceivable risk occurs. This risk

assessment, on a risk assessment template, includes sections relating to bribery which will be specific and proportionate to the area of activity. These will be monitored and managed in accordance with the University's risk management framework policy.

- 6.6. Bribery risk is assessed annually as a specific part of the wider risk assessment measures performed by various colleges, schools and departments of the University. It is however the responsibility of all members to report immediately any potential new risks which may arise.
- 6.7. All senior managers are responsible for communicating the existence of this Policy and related procedures as well as adopting and communicating the University's zero-tolerance approach to bribery and corruption thereby creating an anti-bribery and anti-corruption environment.
- 6.8. The Finance Department is responsible for the collation and registration of the receipt or offering of gifts and/or hospitality and will advise on the appropriate handling of such gifts and/or hospitality in accordance with relevant Regulations, Procedures and Guidance. CoreHR will be used to record the receipt and registration of gifts and/or hospitality.

7. Reporting of gifts and hospitality given or received

- 7.1. The University's Financial Regulations and Procedures set out the required process to obtain permission for offering and to report the receipt of, gifts and/or hospitality. The Financial Regulations are on the intranet at:
https://www.cardiff.ac.uk/_data/assets/pdf_file/0006/199662/Financial-regulations.pdf.
- 7.2. While the procedures set out some guidance on the value of gifts or hospitality, there is in fact no threshold of this sort in the Bribery Act.
- 7.3. Members must register any gift or hospitality in line with the timescales provided in the Financial Procedures.

8. Philanthropic donations and sponsorship

- 8.1. Philanthropic donations and sponsorship sought by or offered to the University must be managed in accordance with the Financial Regulations and Policies/Procedures, and must also be brought to the attention of the Department of Development and Alumni Relations to ensure that required processes are followed.
- 8.2. These include the reclaiming of Gift Aid; formal Gift Agreements or Sponsorship Contracts; due diligence checks for donations or sponsorship over agreed levels; and stewardship/thanking of donors or sponsors (including naming rights) in line with agreed standards.

9. Reporting and consideration of suspected breaches of this Policy

- 9.1. Anyone with a reason to believe that an irregularity with financial or reputational implications for the University has taken or is about to take place, they should report it immediately.
 - 9.1.1 Employees should report it to their line manager or to the senior officer if their line manager is implicated.
 - 9.1.2 Other Members of the University may use the University's Whistleblowing Procedure. Reports may be made directly to the Designated Officer, using the University's Whistleblowing Procedure [here](#).
- 9.2. The requirement to report includes inadvertent discovery of evidence of breaches of this policy through other, non-related, investigations held across the University.
- 9.3. Internal Members are encouraged to ask questions, to raise concerns and to report potential malpractice/ suspicious activity of this nature. When raising a concern or query, or reporting malpractice under this Policy, members will be supported and protected from any adverse treatment.
- 9.4. Other parties, not covered by the Whistle-blowing Procedure, should contact the University's Chief Financial officer, immediately.
- 9.5. It is essential that reports are made at the earliest opportunity to ensure the preservation of any supporting evidence.
- 9.6. Upon receipt of an allegation made under Section 9.1 or 9.2 above, the Chief Financial Officer will convene, as soon as it is reasonably practicable but within five working days, an Assessment Panel. The Assessment Panel will decide on the initial response and where applicable, the next course of action to be taken.
- 9.7. The Assessment Panel will be made up of the following role-holders or their nominees:
 - ① Chief Financial Officer [Chair]
 - ① Director of Strategic Planning and Governance
 - ① The Head of School or Department involved [where applicable]
 - ① Director of Human Resources
- 9.8. If the actual or suspected incident concerns or implicates the Chief Financial Officer the matter should be reported without delay to the Chief Operating Officer. The Director of Strategic Planning and Governance would then lead the Assessment Panel. Should the incident concern or implicate any other member of the Panel then the Chief Financial Officer will appoint a substitute.
- 9.9. Should there be sufficient evidence to initiate an investigation, the allegation will normally be investigated by the Head of the Internal Audit Unit or his/her nominee

and reported back to the Panel. The Panel will then determine under which policy any further necessary action shall be taken.

- 9.10. Where external law enforcement agencies involvement is required, the Designated Officer will make the initial contact and will work with such agencies to assist them with their investigations. Cardiff University reserves the right to proceed with its own disciplinary procedures and/or civil proceedings, notwithstanding police investigations/criminal proceedings.
- 9.11. When applicable, Cardiff University may be required to report such incidences to external bodies through its contracted notification obligations. For instance, this would include the reporting to the Higher Education Funding Council for Wales (HEFCW), of any serious breaches, as required by the terms of HEFCW's memorandum of Assurance and Accountability.

10. Monitoring and Review

- 10.1. The Designated Officer will monitor the effectiveness of this Policy and will review its suitability and adequacy annually. This will include a review to verify compliance with Section 7 above.
- 10.2. Records of gifts and hospitality received or offered will be regularly monitored by Finance.
- 10.3. A review of the completion of the impact risk assessments referred to in section 6.3 above, will be carried out in accordance with the University's risk management framework.

PROCEDURE ON THE ACCEPTANCE AND REGISTERING OF GIFTS AND HOSPITALITY

BACKGROUND

This procedure aims to ensure there is no improper conduct and that [offers of] gifts and hospitality do not influence decisions, judgements and integrity. The procedure stands alongside the University's Financial Regulations. Charitable and philanthropic donations received by the University are subject to separate procedures available from the Development and Alumni Relations department.

In accordance with the Bribery Act 2010, the University and/or its staff may be prosecuted if there is evidence regarding receiving or offering of bribes or inducements.

Please note:

Failure to declare gifts or hospitality or failure to register them in a timely way on the Register of Gifts & Hospitality may be treated as a disciplinary matter and offenders will be dealt with under the relevant University Disciplinary policy for staff. This is particularly likely where acceptance or provision of such gifts or hospitality calls into question the integrity of the individual receiving or offering such gifts or hospitality or where as a result the University is brought into disrepute. This would result in disciplinary action.

This procedure applies to all University staff, irrespective of location where they are based.

All purchasers of goods and services must abide by the Ethical Code of the Chartered Institute of Purchasing & Supply, a copy of which is obtainable [here](#).

PRINCIPLES

University staff must not accept, solicit or offer any personal benefit as an inducement or reward for taking specific action or for showing favour or disfavour to any other person. This includes the acceptance or solicitation of benefits on behalf of other related parties, such as partners, spouses, other family members or colleagues.

Moreover, staff must not accept gifts or hospitality or benefits of any kind if it might be perceived that their personal integrity or professionalism has been compromised, or that their decisions may have been influenced, or if they or the University might be seen to be placed under an obligation.

These principles notwithstanding, the University accepts that there may be circumstances where the acceptance of unsolicited gifts or hospitality will be appropriate, or indeed where declining such gifts or hospitality may cause offence that is detrimental to the University's interests.

It is expressly prohibited for a member of staff to accept gifts or hospitality from an organisation that they know to be actively involved in a planned or actual tender process with the University, except where hospitality is provided as part of a fact finding visit or meeting forming part of the tender

process. If an individual accepts hospitality which could be construed as giving them a conflict of interest in respect of procurement or other decision that they make in the course of their work, they should declare it and exclude themselves from the decision-making process.

Additionally, staff should take care when giving and accepting gifts or hospitality from a person who, or an organisation which, might be perceived to be seeking to gain academic advantage or influence. This will include, but is not limited to, such circumstances as acceptance onto a programme of study, assessing a student's work, or the interpretation or provision of favourable research results.

If, having previously accepted a gift or hospitality, a member of staff finds him or herself in a position where a decision might be construed as having been influenced by the acceptance of that gift or hospitality, the resulting conflict of interest should be declared to the *Responsible Officer* as soon as possible.

The guiding principle is that the gift or hospitality should be proportionate and appropriate to the circumstances in which it is offered or received. Staff should at all times avoid the risk of accepting or providing gifts or hospitality which might be perceived as immoderate, excessive or extravagant, whether by members of the University or the public.

DEFINITIONS

This procedure applies to offers or receipt of gifts and hospitality from the following (non-comprehensive) types of sources:

- Suppliers or their agents;
- Potential suppliers involved in a tendering process (direct and subcontractors);
- Research funders and persons acting on their behalf;
- Students (including current, prospective and former), and their relatives, friends or student sponsors;
- Other universities or third-party organisations;
- Potential or current employees;
- Donors or their relatives.

Gifts shall be understood to mean:

- Any personal, material, tangible and/or financial or other advantage or reward.

Hospitality shall be understood to mean:

- An offer of food, drink, invitations to events, entertainment, travel and/or accommodation.

Examples

Examples of gifts and hospitality which are often offered (but which cannot be accepted) are:

- Invitation to dinner;
- Art work;

- Electrical/electronic equipment;
- Cash or cash equivalent (such as gift vouchers);
- Tickets to a show;
- Invitation to a sporting event;
- Round of golf;
- Use of a holiday home;
- Accommodation and/or travel paid for by an external party.

No money or monetary token of any value should be accepted. If you are offered money you should immediately inform the *Responsible Officer* and record the refusal.

GUIDANCE

General

Before accepting gifts, hospitality or other benefits and irrespective of the guidance given below, staff have a personal responsibility to consider in every case whether acceptance might put them at risk of breach of the principles outlined above. Where this is, or may be perceived to be the case, staff should politely decline.

Receiving Gifts

The University's general rule is that gifts must not be accepted and items for personal use must be declined.

Staff may accept gifts of low intrinsic value for their own use (not exceeding £20 per gift such as tokens of gratitude; promotional and corporate gifts bearing the institutional or organisational logo or name of the giver; or books (including e-books) from publishers to academic staff where the books are relevant to the academic and/or professional interests of the staff concerned.

However, numerous gifts of low intrinsic value from the same supplier or third party to the same person should not exceed a total of £50 per annum.

Individual gifts of a value greater than £20 should be declined or returned. If it would cause embarrassment to return such a gift, staff should be encouraged to find some way to donate them or their cash equivalent to charity. For example, this could be done in the form of a raffle. Regardless of whether it is accepted or declined, any gift above £20 must be recorded in the register of gifts and hospitality. If the gift is of a significant value i.e. over £5000 it must not be accepted.

Receiving Hospitality

Modest hospitality, provided it is reasonable in the circumstances, such as lunches or other meals in the course of working visits is generally acceptable provided its acceptance is consistent with the principles set out above. Such hospitality should not exceed £100.00 per capita (depending on the circumstances) and should be similar to the scale of hospitality that the University would be likely to offer in similar circumstances.

Staff attendance at sporting, cultural or similar events at the invitation of suppliers, potential suppliers or consultants is not generally acceptable to the University.

Regardless of whether it is accepted or declined, any offer of hospitality greater than £100 per capita from a supplier/third party per annum in value must be declared and entered into the University Register of Gifts & Hospitality. Advice in cases of doubt should be sought from the *Responsible Officer*.

Aggregate Threshold

The University has set an aggregate threshold of £5,000 per annum for each third party/supplier (i.e. if a single source has offered gifts or hospitality over the gifts or hospitality threshold in aggregate, even if each individual offer is within the threshold, then the offers would be subject to over-threshold reporting and investigation).

Action	Hospitality	Gifts
Accept and no need to register	Up to £20	Up to £20
Register and may accept	£20 - £100	N/A
Register offer and refer to PVC or Director for authorisation*. Raffle where possible.	>£100	>£20

**May be necessary to decline, depending on the circumstances (for example, if the type and value of hospitality offered is not reasonable/within the norm in the circumstances of the activity in question.*

REGISTER OF GIFTS & HOSPITALITY

The *Responsible Officer* will maintain a Register of Gifts and Hospitality received where the value is in excess of the thresholds previously stated. It is the member of staff's responsibility to inform the *Responsible Officer* of any such gift or hospitality, which includes any above threshold 'free' gift supplied as a promotional item with goods or services ordered for use by the School/Department. Such promotional items may have a corporate use, but are often suitable primarily for domestic use. In the latter case, the item(s) must be declared as a 'gift' and should either be declined or donated to charity.

Where the gift or hospitality offered exceeds these guidelines, but the member of staff considers it in the interest of the University to accept, the reason must be documented and prior authority should normally be obtained from the PVC (for Colleges), Head of School (for School), Director (for Professional Services department), Chief Operating Officer for Directors and Vice-Chancellor (for academic members of the University Executive Board and the Chief Operating Officer).

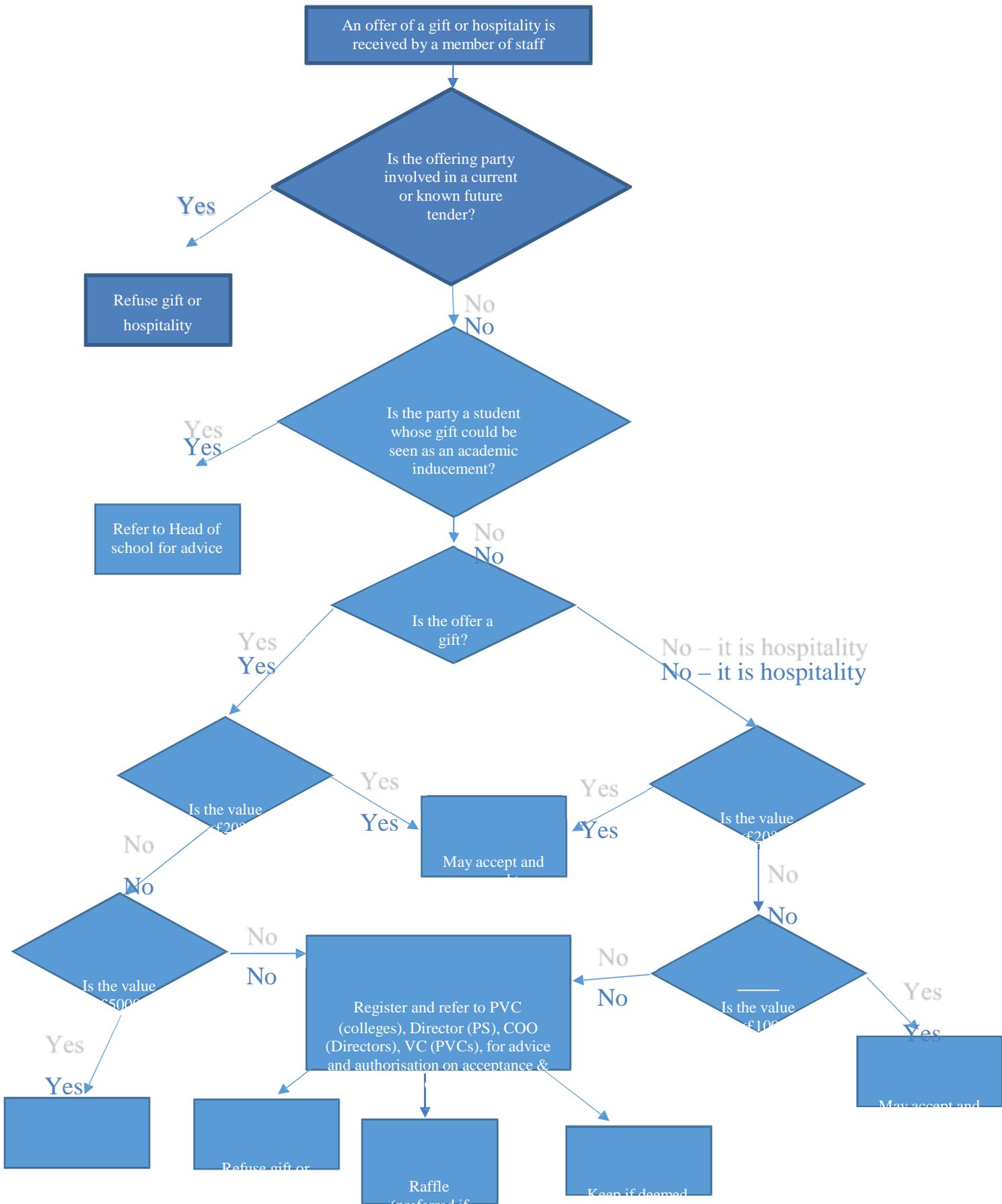
Where it is not possible to do so in advance, retrospective approval shall be sought and reporting and recording proceed according to these procedures. A Gift and/or Hospitality Declaration Form should still be completed and forwarded to the *Responsible Officer*.

The Gift and/or Hospitality Declaration Form can be accessed through the CoreHR Portal. The Register of Gifts and Hospitality will be open to inspection by the internal and external auditors and may be released and/or published in accordance with Freedom of Information requirements.

Further Information

Further guidance and information may be sought from the *Responsible Officer* by emailing ResponsibleOfficer@cardiff.ac.uk

FLOWCHART FOR ACCEPTANCE & REGISTERING OF GIFTS & HOSPITALITY



Bribery Act Working Group – Due Diligence Guidance Note

Overview

The Bribery Act 2010 section 7 creates a new offence which can be committed by commercial organisations which fail to prevent persons associated with them from bribing another person on their behalf.

An organisation that can prove it has adequate procedures in place to prevent persons associated with it from bribing may have a defence to the section 7 offence.

Cardiff University will assess whether any transaction which takes place poses a bribery risk and what measures are required to mitigate this. It has been advised that procedures should be proportionate to the individual risk and will need to consider the types of risk faced, the nature of the relationship and, size of the organisation and complexity and location of its activities.

Considerations

Due diligence must be carried out for all new arrangements/contracts where the potential risk of bribery has been identified. In order to ascertain whether there is a risk of bribery in agreements, it is recommended that the following steps are considered:

- **Assessment of arrangement type** - i.e. nature of agreement, whether services are provided and who is involved.
- **Assessment of external risk** –
 - Country risk - risk level of country where services are provided i.e. does country have perceived high levels of corruption, anti-bribery legislation and its implementation/enforcement?
 - Sector risk – i.e. is the sector perceived to be more at risk to bribery and corruption?
 - Transaction risk – is arrangement transaction likely to give rise to potential bribery, are pre-conditions needing to be satisfied for the arrangements e.g. obtaining licenses?
 - Business opportunity risk – is the arrangement unusually high profile, lucrative, important? Are there clear objectives in place?
 - Any mergers and acquisitions involving the organisation
 - private equity
 - Any projects involving many contractors or intermediaries
- **Assessment of other party** – i.e. what is their reputation? Is there any evidence of prior reports/allegations of bribery or corruption? Does it operate through a third party?
- **Due diligence** – this should be carried out when consideration of the above has identified a potential risk of bribery when entering into a new arrangement/contract. The process and level of staff involvement should be appropriate for the value of the transaction and perceived level of bribery. The following list (not exhaustive) should be considered:
 - Request information on the company's approach to bribery risk reduction
 - Request copies of compliance policies, audits, reports and training items.

- Request information on what processes exist to prevent bribery and the adequacy of such policies
 - Assess nature/extent of approach to compliance and risk
 - If third parties are used – request information on how these are selected.
- Has the company/ third party been investigated in relation to corruption?
- If yes – how have these been addressed?
 - A list of corruption indicators can be found on The Serious Fraud Office’s website: <https://www.sfo.gov.uk/>

PLEASE NOTE:

- **Communication** – it is advised that all potential business partners be informed of the University’s policy prior to arrangement commencement and this must be in writing.
- **Provisions** – the evaluation of the risk analysis should directly feed into the creation of specific contract clauses.
- **Contractual Exposure** - If corruption has been identified via the due diligence checks and the University proceeds with an agreement, then warranties may be unenforceable.

It is important for the University to consider contractual protections in agreements in addition to carrying out due diligence. Note, if the due diligence process has clearly identified specific risks/activities which may give rise to breaches of anti-corruption and anti-bribery legislation, contractual protections including warranties may not be fully enforceable. Reputational issues should also be considered, even in the event of comprehensive contractual protections.



**Cardiff University Risk Management Framework
Anti-Bribery Risk Assessment**

If you require further guidance on completing this form please contact the Strategic Planning and Governance Department at AssuranceServices@cardiff.ac.uk.

This is a mandatory exercise which must be completed annually or more frequently if necessary*. Your colleagues should be made aware of the contents of this assessment and a copy should be sent to the Department of Strategic Planning and Governance.

(* for example, in the event of change of activity, partnership and location of activity etc. Revised assessments must be sent to the Department of Strategic Planning and Governance.)

Date assessment submitted:	School/Professional Service Department:
1) Explain the nature of the work undertaken by your School/Professional Service. This should include the school's/professional service's key objectives, main activities, geographical location of activities and academic and business relationships.	
2) Do you enter into any contracts or arrangements that are not processed through either Purchasing, Research Innovation Services, Estates, Finance or Strategic Planning and Governance?	

<p>3) If the answer to the previous question is no, please proceed to question 8 below. If the answer to the previous question is yes, please answer questions 4 to 7 below, and then continue with the remainder of the form.</p>	
<p>4) Please detail the contracts or arrangements.</p>	
<p>5) Do you have any dealings with foreign public officials in order, for example, to obtain a necessary licence/permit in relation to these contracts?</p>	
<p>6) Do you undertake due diligence*</p> <p>*Due diligence guidance can be found at www...</p>	
<p>7) Does your School/Professional Service use third party agents in relation to these contracts? If so, did you undertake due diligence in relation to those agents, and on what basis are they paid e.g. by results?</p>	

<p>8) Are corporate hospitality/ gifts or expenses commonplace within your area of activity?</p>	
<p>9) Are you aware of the University *policy on gifts and hospitality and the consent and registration requirements? *the Policy on receiving or offering gifts and hospitality can be found at www...</p>	
<p>10) Does your School/Professional Service experience of requests for facilitation payments or similar inducements such as unusual payment methods, requests for donations to charities based outside the European Economic Area (or outside overseas jurisdictions offering an equivalent level of anti-bribery protections), political causes and/or charities based in high risk jurisdictions, etc.)</p>	
<p>11) Does your School/Professional Service undertake any business via a joint venture, collaboration, partnership, spin-out or subsidiary?</p>	
<p>12) If yes, and they were not established through either Purchasing, Research Innovation Services, Finance or Strategic Planning and Governance, please provide details.</p>	

<p>13) Does your School/ Professional Service operate any bonus system under which employees are paid by results?</p>		
<p>14) Please add any other comments which you believe are relevant.</p> <p>[This may involve identifying specific risks, persons involved and any other areas of concern which you believe are relevant]</p>		
<p>15) Please provide the name, job title and contact information for the primary and deputy contact for all matters concerning the University's anti-bribery policy for your school/Professional Service.</p>	<p>Primary Contact</p>	<p>Deputy Contact</p>
<p>Completed by:</p> <p>Date:</p>		