

Anti-Bribery and Corruption Policy

Version Control

Version Number	UEB Sponsor	Approval Body/Officer	Date of approval
4.0	Chief Financial Officer	University Executive Board	24th June 2025

For queries on this policy please contact:

Head of Financial Compliance via email financialcompliance@cardiff.ac.uk

1. Purpose and Scope

- 1.1. This document sets out the approach taken in relation to the prevention, detection and deterrence of bribery and corruption at Cardiff University.
- 1.2. The Anti-bribery and Corruption Policy defines roles and responsibilities, and aims to ensure that Cardiff University complies with all appropriate anti-bribery and corruption legislation, not limited to:
 - Bribery Act 2010
 - Proceeds of Crime Act 2002 (as amended) (POCA)
 - Charities Act 2006 and 2011
 - Criminal Finances Act 2017
 - Public Interest Disclosure Act 1998
- 1.3. As a registered charity, the guidance issued by the Charity Commission is also considered.
- 1.4. This policy also aims to ensure there is no improper conduct, or perception of improper conduct, in the offer or acceptance of gifts and hospitality and that offers of gifts and hospitality do not influence decisions, judgements and integrity.
- 1.5. This policy is applicable to all staff of the university (including those employed on a permanent, fixed term, temporary contract, or self-employed basis), students, and third parties, not limited to academic partners undertaking business on behalf of the university and seemingly unrelated external individuals and organisations. It is applicable to activities completed in the UK and overseas.
- 1.6. Wholly owned subsidiaries may adopt this policy or establish one of their own. However, the content of any separate policy must adhere to the requirements set out in this document as a minimum.
- 1.7. Charitable and philanthropic donations received by the University are subject to separate procedures available from the Development and Alumni Relations department.
- 1.8. All purchasers of goods and services must abide by the **University Procurement Policy**.
- 1.9. Should any monetary gift or item of value be offered to the University, rather than to individuals, the Development & Alumni Relations (DEVAR) Team, in association with other areas as appropriate, such as the Special Collections Team, will oversee the approach. These types of donations fall outside of the Anti-Bribery and Corruption Policy.

2. Definitions

- 2.1. Bribery is defined as giving someone a financial (or other) advantage to induce them (or another person) to perform their functions or activities improperly; or to reward that person for having already done so.
- 2.2. A bribe can be given directly or indirectly.
- 2.3. A bribe 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.
- 2.4. 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 to influence a trustee or official to act in a certain way or make a particular decision.
- 2.5. 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.

3. Policy

- 3.1. Cardiff University 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 University has a zero-tolerance policy towards bribery, and is committed to the highest level of openness, integrity, and accountability, both in letter and in spirit.
- 3.2. Cardiff University is committed to observing the provisions of the Bribery Act 2010 in all its affairs, whether academic or business related. Cardiff University prohibits all forms of bribery and corruption.
- 3.3. The University will not tolerate the offering, giving, solicitation, or acceptance of any form of bribe, whether in cash or in-kind, in exchange for any kind of advantage or benefit, whether for the University or for any individual associated with the University.
- 3.4. The University will protect any person who reports suspected bribery or corruption from retaliation or victimisation in line with the Public Interest Disclosure (Whistleblowing) Policy.

Gifts and hospitality

- 3.5. University staff should also be aware that, under the provisions of the Bribery Act 2010, the inappropriate giving or receiving of gifts or hospitality may leave individuals open to charges of bribery.
- 3.6. 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 or organisation. This includes the acceptance or solicitation of benefits on behalf of other related parties, such as partners, spouses, other family members or colleagues.
- 3.7. 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.
- 3.8. 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.

- 3.9. These principles notwithstanding, the University accepts that there may be circumstances where the acceptance or reciprocal exchange of gifts or hospitality will be appropriate, or indeed where declining such gifts or hospitality may cause offence on religious or cultural grounds that is detrimental to the University's interests. In such circumstances, gifts or hospitality must be proportionate and appropriate to the circumstances in which it is offered or received.
- 3.10. 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.
- 3.11. The University does not encourage the acceptance of gifts or hospitality from a student, group of students or their families. To avoid misunderstanding or offence, schools are encouraged to make the University's policy clear to their students from the outset, and to emphasise that gifts and offers of hospitality to staff are not expected.

Additional considerations if accepting gifts or hospitality

- 3.12. Staff should only accept gifts or hospitality that is reasonable, proportionate and appropriate to the circumstances in which it is offered or received and of low intrinsic value.
- 3.13. If an individual accepts hospitality which could be construed as giving them a conflict of interest in respect of decisions that they make in the course of their work, they must declare it and exclude themselves from the decision-making process.
- 3.14. If, having previously accepted a gift or hospitality, a member of staff finds themselves 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 must be declared as soon as possible.
- 3.15. Staff must declare the offer of any gift, including those that are not accepted.

Additional considerations if providing gifts or hospitality

- 3.16. Staff should always avoid the risk of providing gifts or hospitality which might be perceived as immoderate, excessive or extravagant, whether by members of the University or the public.
- 3.17. Staff must be mindful that the value of all gifts and hospitality offered by the University to others are sourced from public and charitable funds. Such funding must be used for legitimate purposes only and demonstrate value for money.
- 3.18. Additionally, it is never permitted to offer or provide gifts or hospitality:
- Of money or of a monetary nature
 - Of excessive value
 - To induce an individual or organisation to provide services or preferential treatment or gain influence
 - In expectation of or reward for an individual or body not performing their work in a proper or an impartial manner
 - To any individual or organisation responsible for a formal application, finance decision, sourcing or tendering

4. Roles and Responsibilities

4.1. The prevention, detection and reporting of bribery is the responsibility of:

- All employees, honorary members, students, Council members (“internal members”), and
- Agency staff, volunteers, contractors and business partners and third parties who act on behalf or provide services to the University (“external members”).

4.2. The penalties for these offences are severe and can result in up to 10 years imprisonment and/or an unlimited fine for the employees responsible.

4.3. Should the University be found to have failed to prevent bribes being made or received by individuals in order to further business objectives, it could be subject to unlimited fines, substantial reputational damage and harm to its ability to compete for certain public contracts in the future, and apply for or receive public funds and charity donations.

Role	Responsibility
University Council	Ensuring that the University has a robust and comprehensive system of risk management, control and corporate governance. This includes the prevention and detection of bribery and corruption, fraud or other irregularities.
Vice Chancellor	<p>Ensuring that the Department Directors and College Leadership develop and maintain effective controls to prevent bribery and corruption, including around the offer and receipt of gifts and hospitality.</p> <p>Carrying out vigorous and prompt investigations if bribery or corruption occurs.</p> <p>Taking appropriate legal and/or disciplinary action against perpetrators of bribery, corruption or undue influence.</p> <p>Taking disciplinary action against supervisors where supervisory failures have contributed to the instance of the bribery or corruption.</p>
College Leadership	<p>Identifying the risks to which systems and procedures are exposed.</p> <p>Developing and maintaining effective controls to prevent and detect bribery or corruption.</p> <p>Ensuring that controls are being complied with.</p> <p>Promoting good practice in their own areas of operation.</p>
Individual members of staff	<p>Ensuring that they comply with this policy at all times.</p> <p>Acting with propriety in the use of official resources and in the handling and use of corporate funds, whether they are involved with cash or payments systems, receipts or dealing with contractors or suppliers.</p> <p>Reporting details immediately to their line manager if they suspect or become aware of any form of bribery or corruption; or where a suspicion is held that may involve their line manager, they may approach their line manager’s line manager.</p> <p>Registering offers of gifts or hospitality in line with the guidance.</p> <p>Making the necessary declarations and flagging potential conflicts of interest.</p>

	Seeking further guidance if unclear about appropriate or required actions.
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5. Monitoring and Review

Reporting

- 5.1. The University will take all reasonable steps to identify and investigate instances of bribery and corruption and, where those investigations conclude that suspicions are confirmed, it will take appropriate disciplinary action.
- 5.2. In addition, the University is also obliged to report to the Charity Commission (CC) and/or Medr should it be deemed that an investigated case meets with the reporting threshold. These reports will be made in accordance with the University's Serious Incident Reporting Framework.
- 5.3. Members must register any gift or hospitality in line with the timescales provided in **Appendix F** below.
- 5.4. The University will take all reasonable steps to identify and investigate instances of bribery and corruption and where those investigations conclude that suspicions are confirmed, it will take appropriate disciplinary action.
- 5.5. 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.
- 5.6. 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.
- 5.7. 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. Staff should be aware that, while this Policy sets out some guidelines on the value of gifts or hospitality, there is in fact no threshold of this sort in the Bribery Act.
- 5.8. In addition, the University is also obliged to report to the Charity Commission (CC) and/or Medr should it be deemed that an investigated case meets with the reporting threshold. These reports will be made in accordance with the University's Serious Incident Reporting Framework.

Training

- 5.9. The Chief Financial Officer is responsible for ensuring that training is available to support the implementation of this Policy, and all staff are responsible for ensuring that they take up mandatory training. Please see **Appendix B** for further information.

Record keeping

- 5.10. The Bribery Act 2010 requires the University to demonstrate that it takes "adequate procedures" to prevent bribery. This includes the maintenance of written procedures, reviews for compliance with this Policy and training of all relevant persons.
- 5.11. The Chief Finance Officer is responsible for ensuring that training completion rates are monitored in line with the Mandatory Training Policy.
- 5.12. The University commits to taking reasonable care to make and keep adequate records which are appropriate to the scale, nature and complexity of the University's business. These records

typically include Gifts and Hospitality logs, investigation reports and training records. All such records must be retained for five years from the date on which reliance commences.

5.13. Any personal data collected with a view to compliance with this Policy will be processed on the legal basis of Processing that is necessary for compliance with a legal obligation to which the Data Controller is subject. Storage of this data will be subject to appropriate levels of technical and organisational security as will any transfer of data to an official body for the purposes of the prevention and detection of crime prevention and detection of crime.

Monitoring

5.14. The Chief Finance Officer, with support from the Head of Financial Compliance, will devise and implement arrangements to ensure that compliance with this Policy is kept under continuous review through regular departmental file reviews, including standard operating procedures, and reports and feedback from staff. Internal Audit may undertake reviews of this area as part of their risk-based audit programme of work or as an investigation if required. Outcomes of the testing will be reported appropriately.

5.15. An Annual Financial Compliance Report is provided to Audit and Risk Committee (“ARC”) by the Head of Financial Compliance, and this includes the activities undertaken in respect of anti-bribery activities. This enables ARC to have oversight of the effectiveness of the Policy and take into consideration recommendations made by the Chief Financial Officer and others during the year to improve the operational effectiveness across the institution. Any issues raised, or if risk exceeds institutional appetite, are reported to Council via the ARC Annual Report.

6. Related Policies and Procedures

6.1. This Policy should be read in conjunction with:

- Financial Regulations - Cardiff University
- Counter-Fraud Policy
- Anti-Money Laundering, Counter Terrorist Financing, Financial Sanction Compliance and Tax Evasion Prevention policy
- Procurement Policy
- Public Interest Disclosure (Whistleblowing) Policy
- Data Protection Policy
- Records Management Policy
- Code of External Funding Practice
- Mandatory Training Policy
- Serious Incident Reporting Framework
- Disclosure of Interests policy
- Academic Research Misconduct Procedures

Policy Version Control Information

Document Name	<i>Anti-Bribery and Corruption Policy</i>
UEB Policy Sponsor	<i>Chief Financial Officer</i>
Policy Owner	<i>Chief Financial Officer, Finance</i>
Policy Author(s)	<i>Helen Bennett, Head of Financial Compliance, Finance</i>
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Date of Last Review	02/06/2025

Change History Record:

Version amended and date of review	Reviewer(s)	Description of Change	Version created
4.0	Helen Bennett, Head of Financial Compliance	Updated in line with current guidance	5.0

Appendices

Appendix A – UK legislative and regulatory framework

The Bribery Act 2010 (The Act) makes it an offence for a UK national, or person located in the UK to pay or receive a bribe, either directly or indirectly. The Act covers transactions that take place in the UK or abroad, and both in the public or private sectors.

There are three main offences:

1. The offence of bribing another person

1.1. An offence has been committed if the bribe payer:

- intends the offer, promise or giving of a financial or other advantage to bring about or reward another person's improper performance of a relevant function or activity; or
- knows or believes that the acceptance of the financial or other advantage offered, promised or given, in itself, constitutes the improper performance of a relevant function or activity.

1.2. The offer, promise or giving of an advantage can be direct or indirect.

2. Offences relating to being bribed

2.1. A person commits an offence if, directly or indirectly, they request, agree to or accept a financial or other advantage:

- intending that a relevant function or activity should be performed improperly, either by them or by a third party
- when to do so, in itself, would be improper performance of a relevant function
- as a reward for carrying out a relevant function improperly, or
- in anticipation or consequence that they (or someone else at their request or with their assent or acquiescence) will perform a relevant function improperly.

3. Bribery of a foreign official

3.1. It is an offence to attempt to influence a person acting in their capacity as a foreign public official by offering, promising or giving a financial or other advantage to obtain or retain business or a business advantage.

3.2. It is still an offence if the offer, promise or giving is done through a third party and/or where the offer, promise or giving of a reward is to a third party at the foreign public official's request or agreement.

The UK Bribery Act 2010: The six prevention principles

To assist the University in combatting bribery and corruption within the institution, it advocates the deployment of the six prevention principles set out in the UK Bribery Act 2010 as follows:

1. Proportionate procedures

1.1. Procedures should be proportionate to the bribery risks an organisation faces (taking into account the size, nature and complexity of its business).

2. Top-level commitment

2.1. Top-level management should be committed to preventing bribery by associated persons.

3. Risk Assessment

3.1. The organisation assesses the extent of its exposure to applicable bribery risks.

4. Due Diligence

4.1. The organisation applies due diligence procedures, taking a proportionate and risk-based approach, in order to mitigate identified bribery risks.

5. Communication (including training)

5.1. The organisation communicates and embeds its policies and procedures throughout the business and provides appropriate training on bribery risks.

6. Monitoring and review

6.1. The organisation monitors, reviews and improves its procedures to prevent bribery.

Appendix B - Training

All staff will be expected to complete anti-bribery and corruption training on an annual basis in the form of a mandatory online module which is reviewed and updated by the Head of Financial Compliance.

All staff that undertake a role that is considered to have a higher perceived risk to bribery and corruption will be expected to complete an annual, enhanced financial crime training module, including:

- Finance (including Procurement)
- International Office
- Student Recruitment
- Admissions
- English Language Programmes
- Registry Operations
- Development & Alumni Relations
- Human Resources
- Research & Innovation Services
- University Secretary's Office
- Any member of staff performing a "Senior Management" role.

Appendix C – Risk Assessment

The university is committed to putting in place appropriate, proportional, and adequate controls, that are practical, understood and adhered to, to manage financial crime risks. To inform the approach and

target resources accordingly, a financial crime risk assessment is maintained, incorporating bribery and corruption. Further details can be found in the Anti-Money Laundering, Counter-Terrorist Financing, Financial Sanction and Tax Evasion Policy.

Appendix D – Raising a Concern

Should a suspected instance of bribery or corruption or the abuse of the gifts and hospitality process be identified, it should be reported to your manager, and they should inform the Chief Finance Officer, via the Head of Financial Compliance, immediately. Reports should be sent to the Financial Compliance email address: financialcompliance@cardiff.ac.uk

If for any reason you do not wish to go through your manager, report the situation yourself via the above email address.

Appendix E - Investigations

Any instances of bribery and/or corruption will be investigated by the Financial Compliance function in line with internal procedures.

Appendix F – Additional Gifts and Hospitality Guidance

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

University staff and associated persons are expressly prohibited from personally soliciting or requesting gifts or hospitality, and the exchange of gifts or hospitality shall always be acknowledged openly and transparently.

All disclosures are required to be made upon receipt of offer of gift or hospitality and in any event no later than 30 days from receipt of offer.

An offer of gift or hospitality must not be accepted before it has been approved as acceptable.

No money or monetary token can be accepted or given.

Receiving Gifts

The University's general rule is that it will not usually be considered appropriate for University Staff to receive gifts and offers should be politely declined.

Staff may accept gifts of low intrinsic value for their own use (not exceeding £20 per gift) such as 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.

Numerous gifts of low intrinsic value from the same supplier or third party to the same person should not exceed a total of £500 per annum.

For individual gifts of a value greater than £20, approval should be sought in advance, where possible.

Regardless of whether it is accepted or declined, the offer of any gift above £20 must be recorded in the Register of Gifts and Hospitality via CORE.

Individual gifts of a significant value i.e. over £500 must not be accepted.

No money or monetary token of any value should be accepted under any circumstances. If you are offered money, you should immediately inform the Head of Financial Compliance (financialcompliance@cardiff.ac.uk) and record the refusal in the HR system.

Receiving Hospitality

Modest hospitality (i.e. that which is clearly reasonable, such as lunches or other meals in the course of working visits) is generally acceptable, provided its acceptance is consistent with this policy.

Such hospitality should not exceed £100.00 per person and should be similar to the scale of hospitality that the University would likely 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 £20 per person from a supplier/third party per annum in value must be declared in the HR system.

Receiving Gifts or Hospitality: Exceptional Circumstances

There may be instances where it is not possible to refuse a gift without causing offence.

In such cases, staff should seek advice from their Department Director or College Leadership, who may refer to the Head of Financial Compliance, to determine whether the gift should be accepted and on what terms.

If it is considered to be in the interest of the University to accept, the reason must be documented and prior authority should normally be obtained from the Pro Vice Chancellor (for Colleges), College Leadership (for Schools), Director (for Professional Services departments), Chief Operating Officer (for Directors of Professional Services departments) or Vice-Chancellor (for members of the University Executive Board).

Where it is not possible to do so in advance, retrospective approval shall be sought, and reporting and recording proceed according to these procedures.

Staff may be encouraged to consider donating the gift to their department or to charity to avoid the perception of undue influence.

Staff who are uncertain or concerned about the exchange of gifts/hospitality should seek advice from their Department Director or College Leadership in the first instance.

Further advice may also be sought from the Head of Financial Compliance using the email address: financialcompliance@cardiff.ac.uk

The Provision of Gifts or Hospitality

There may be circumstances where it is appropriate to provide token gifts or hospitality during the normal course of work. Prior approval should be obtained by staff from their Department Director or College Leadership.

It should be noted that it is not uncommon for research participants to be paid with either cash or gift vouchers. This is acceptable, as long as it is in line with the guidance issued by the relevant school. Making cash payments is subject to additional controls and review.

Authority to Accept Gifts and Hospitality

University Staff will usually be expected to politely decline offers of gifts or hospitality. However, gifts and hospitality that are in compliance with the standards set out above may be authorised for acceptance as follows:

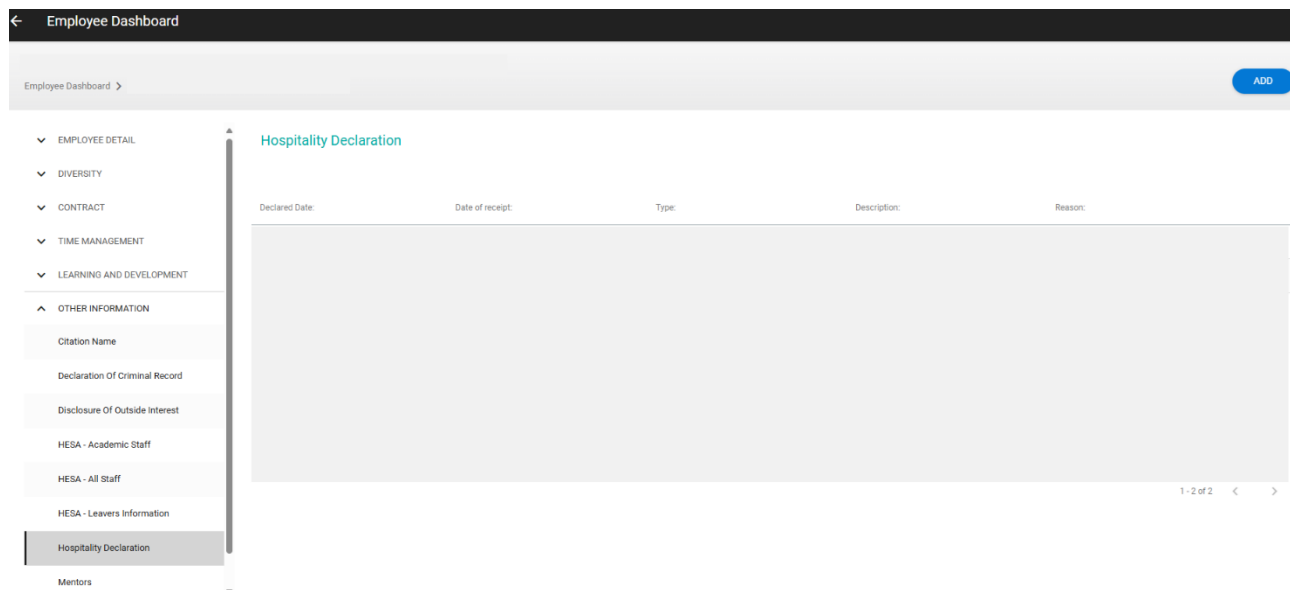
Type	Gift	Hospitality	Required action
Single incident	Up to £20	Up to £20	No disclosure required. Permitted to accept.
Single incident	Above £20	Above £20	Make disclosure – await decision. PVC, Director or College Leadership to make decision and record in the HR system.
Multiple incidents	Gifts from the same source should not exceed £500 per recipient per annum. Hospitality from the same source should not exceed £500 per recipient per annum. Gifts or hospitality from the same source should not exceed £5,000 per annum across the University.		

Register of Gifts & Hospitality

HR will maintain a Register of Gifts and Hospitality.

It is the member of staff's responsibility to register the offer of any gift or hospitality above the reportable threshold.

The Gift and/or Hospitality Declaration Form can be accessed through the HR System.



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.

Definitions and Examples

This policy applies to offers or receipt of gifts and hospitality from the following (non-exhaustive) 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:	Hospitality shall be understood to mean:
<ul style="list-style-type: none">• Any personal, material, tangible and/or financial or other advantage or reward• Gifts offered may range in value, and may commonly include business and branded stationery, food and beverages, or corporate gifts such as ornamental items• Promotional items included for “free” alongside goods or services ordered for use by the School/Department should also be considered under this policy.	<ul style="list-style-type: none">• An offer of food, drink, invitations to events, entertainment, travel and/or accommodation• This includes gifts and/or hospitality offered to family members alongside a link to University activity or business.

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

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