

## **Anti Bribery Policy**

### **1. Introduction**

- 1.1 London South Bank University (LSBU) and companies within the LSBU group (collectively “LSBU Group”) are committed to acting in accordance with the highest ethical and legal standards. The integrity of our staff, and those with whom we do business, is critical to our success and one of our values.
- 1.2 LSBU Group is committed to acting professionally, fairly and with integrity in all its business dealings and relationships wherever it operates.
- 1.3 LSBU Group has zero-tolerance to bribery and corruption.
- 1.3 LSBU Group is committed to upholding all laws to prevent bribery and corruption in all the countries in which we operate. In particular, we are committed to compliance with the Bribery Act 2010, in respect of our conduct both at home and abroad.
- 1.4 The offer of bribes or facilitation payments of in any of the countries in which we operate is against LSBU Group policy.
- 1.5 The prevention, detection and reporting of bribery and other forms of corruption are the responsibility of all those working for us or under our control. All staff are required to avoid any activity that might lead to, or suggest, a breach of this Policy.

### **2. Definitions**

- 2.1 A bribe is an inducement or reward offered, promised or provided in order to gain any commercial, contractual, regulatory or personal advantage.
- 2.2 Facilitation payments are typically small, unofficial payments made to secure or expedite a routine or necessary government action by a government official, when we have already paid for, or are entitled to, that action.

### **3. Scope – who is covered by this procedure?**

- 3.1 This policy applies to all people or companies working for LSBU Group at all levels, including all employees (whether permanent, fixed term or temporary), consultants, contractors, trainees, seconded staff, casual staff and agency staff, volunteers, interns, agents, sponsors, or any other person associated with us, or any of our subsidiaries or their employees, wherever located (collectively referred to as “staff” in this policy).
- 3.2 Compliance with this policy is mandatory. Any employee who breaches this policy will face disciplinary action, which could result in dismissal for gross misconduct.

### **4. Links to other Policies**

- 4.1 The LSBU Gifts and Hospitality Policy and the Gift Acceptance Policy should be read in conjunction with this policy as in some circumstances unreasonable or disproportionate gifts or hospitality may be used as bribes.

### **5. Procedure**

- 5.1 All staff must ensure that they read, understand and comply with this Policy.
- 5.2 All staff are encouraged to raise concerns about any issue or suspicion of bribery at the earliest possible stage – potential bribery risk scenarios are listed below.
- 5.3 Staff should report anything that they believe to be a bribe immediately to the Group Chief Financial Officer or by following the procedure set out in the LSBU Group Speak Up Policy.
- 5.4 If you are unsure whether a particular act constitutes bribery, or if you have any other queries, these should be raised with your line manager OR the Group Solicitor & Director of Legal Services.
- 5.5 If you are asked to make a facilitation payment on LSBU’s behalf, or on behalf of another entity within the LSBU Group, you should immediately discuss this with your line manager or the Group

Solicitor & Director of Legal Services or the Group Head of Procurement & Payments.

- 5.6 LSBU Group's 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 continuing.

## **6. Potential bribery risk scenarios: "red flags" at London South Bank University and within the Group**

- 6.1 The following is a list of possible red flags that may arise during the course of your work, whether academic or support, and which may raise concerns about compliance with the UK Bribery Act 2010. The list is not intended to be exhaustive.

If you encounter any of these "red flags" while working for LSBU Group, you must report them promptly to your line manager OR to the University Solicitor OR under the LSBU Group Speak Up Policy (see staff Gateway):

- (a) a student offers you a payment or gift and requests that you provide some academic advantage to the student.
- (b) a student's family offers you a payment or gift and requests that you provide some academic advantage to the student.
- (c) an LSBU Group academic/member of teaching staff is offered an unusually generous gift or offered lavish hospitality by a student or the student's family prior to an important academic assessment.
- (d) you learn that a student recruitment representative has a reputation for paying bribes, or requiring that bribes are paid to them, or has a reputation for having a "special relationship" with foreign government officials.
- (e) a student recruitment representative requests that payment is made to a country or geographic location different from where they do business.
- (f) a student recruitment representative requests or requires the use of an agent or intermediary that is not typically used by or known to us;
- (g) a supplier to LSBU Group requests payment in cash and/or refuses to

sign a formal commission or fee agreement, or to provide an invoice or receipt for a payment made.

- (h) you become aware that a supplier to LSBU Group engages in, or has been accused of engaging in, improper business practices.
- (i) you receive an invoice from a supplier to LSBU Group that appears to be non- standard or customised.
- (j) a service provider to LSBU Group requests an unexpected additional fee or commission to "facilitate" a service.
- (k) a potential supplier to LSBU Group demands or offers lavish entertainment or gifts before commencing or continuing contractual negotiations or provision of services.
- (l) a potential contractor of LSBU Group insists on receiving a commission or fee payment before committing to sign up to a contract with us.
- (m) a contractor insists on the use of side letters or refuses to put terms agreed in writing.
- (n) an existing contractor requests that a payment is made to "overlook" potential legal violations by them.
- (o) you notice that LSBU or a Group member is invoiced for a commission or fee payment that appears large given the service stated to have been provided.