UKMC

Anti-Bribery and Corruption Policy

Date	Author	Summary of Changes	Version	Authorised
March 2024	Head of HR	Development of formalised policy	1	Academic Board
July 2025	Head of HR; Head of Quality and Compliance	Comprehensive update aligned with OfS condition E8 (fraud and the inappropriate use of public funds); incorporated the Bribery Act 2010 six principles; added facilitation payments, political and charitable donations, third-party due diligence, reporting routes and oversight by the Audit and Risk Committee; cross-referenced the Risk Management Policy and Framework and the Whistleblowing Policy	2	Academic Board

Policy/Procedure Management and Responsibilities	
Policy/Procedure Owner	Owned by the Head of HR, with the Finance Committee supporting oversight; approved by the Executive Board and the Academic Board. Day-to-day implementation and compliance are delegated to the HR and Finance teams. Oversight and assurance are provided by the Audit and Risk Committee and the Board of Directors, with the Academic Board receiving reports where relevant to tuition and recruitment.
Equality Analysis	Completed as part of the annual governance review (December 2025); confirms no disproportionate impact on protected groups under the Equality Act 2010.
Authorised By	Executive Board and Academic Board (minor updates may be authorised by the Head of Finance or Registrar on behalf of the Board)
Effective From	19 Sep 2025

Next Review	31 August 2028 (annual AML risk assessment by the MLRO and Head of Finance)
Internal/External	Both
Document Location	UKMC | Policies and Legislation & internal Policy development Area
Linked Documents and Policies Internal	Risk Management Policy and Framework; Whistleblowing Policy; Fraud Response Procedure and Fraud and Public Funding Declaration; Conflicts of Interest Policy;
Dissemination Plan	Staff portal, induction packs, annual refresher sessions, student and policy handbooks, and Quality and Standards Committee reporting C
Accessibility	**Alternative formats available on request** to quality@ukmc.ac.uk

1. Purpose and rationale

Bribery and corruption are, in the conduct of UK Management College's ("the College's") business, the offering or accepting of any gift, loan, payment, reward or advantage for personal gain as an encouragement to do something dishonest, illegal or a breach of trust, to prevent fair competition, or the abuse of entrusted power for private gain. Bribery and corruption are criminal offences under the Bribery Act 2010, and the College prohibits any form of bribery. The College requires compliance, from everyone connected with its business, with the highest ethical standards and with applicable anti-bribery and anti-corruption laws. Integrity and transparency are of the utmost importance, and the College has a zero-tolerance approach to corrupt activity of any kind, whether by its own staff or by third parties acting for or on its behalf. The proper stewardship of public funds is central to this commitment.

2. Aims and objectives

The College is committed to taking all necessary steps to counter fraud, bribery and corruption. This policy explains what bribery and corruption are, makes clear that preventing them is everyone's responsibility, sets out how the College discharges its obligations, and explains how to report concerns. It forms part of the College's comprehensive arrangements for preventing, detecting and stopping fraud and the inappropriate use of public funds under OfS condition E8.

3. Scope

This policy applies to all employees of the College, regardless of seniority or campus, and to anyone working for or on the College's behalf — including those engaged on a self-employed or agency basis, contractors, suppliers, agents, recruitment intermediaries, partners, students and members of the governing body. The College requires the application of this policy in all its dealings with third parties.

4. Legal and regulatory framework

This policy is underpinned by the Bribery Act 2010 and the Fraud Act 2006, by the failure-to-prevent-fraud offence under the Economic Crime and Corporate Transparency Act 2023, and by the Proceeds of Crime Act 2002, the Money Laundering Regulations 2017, the Terrorism Act 2000 and the Sanctions and Anti-Money Laundering Act 2018. It supports the College's compliance with OfS initial condition E8 (fraud and the inappropriate use of public funds) and operates alongside the Risk Management Policy and Framework and the Whistleblowing Policy. Compliance is mandatory.

5. Definitions

Corruption is the misuse of office or power for private gain. Bribery is a form of corruption in which, in the course of business, money, gifts, hospitality, favours or anything else of value is given or received as an inducement to do something dishonest or illegal, or to secure an improper advantage. A facilitation payment is a small unofficial payment made to secure or speed up a routine action to which the payer is already entitled. A third party is any individual or organisation the College comes into contact with in the course of its work, including suppliers, agents, recruitment intermediaries, partners and contractors. A public official includes any person holding a legislative, administrative or judicial position, or otherwise exercising a public function.

6. Policy statement

It is prohibited, directly or indirectly, to offer, give, request or accept any bribe — any gift, loan, payment, reward or advantage, in cash or any other form — in order to gain a commercial, contractual or regulatory advantage for the College, or any personal advantage for an individual or anyone connected with them, in a way that is unethical or unlawful. It is also prohibited to act in this way to influence a foreign public official, or to make a payment to a third party on behalf of a foreign public official. The College will ensure that all of its transactions, including any sponsorship or donations, are made transparently and legitimately, and will carry out appropriate checks before engaging suppliers or other third parties to reduce the risk of its business partners breaching these rules.

7. Bribery Act 2010 — the six principles

The College's anti-bribery procedures are built on the six principles for adequate procedures set out in the guidance to the Bribery Act 2010:

Table 1 — The six principles and how the College applies them

Principle	How the College applies it
1. Proportionate procedures	The College maintains anti-bribery procedures proportionate to the bribery risks it faces and to the nature, scale and complexity of its activities, including this policy, the gifts and hospitality register, and procurement and due-diligence controls.
2. Top-level commitment	The Board of Directors and Executive Board are committed to preventing bribery, foster a culture of zero tolerance, and provide clear leadership, communication and resource.
3. Risk assessment	The College assesses its exposure to bribery and corruption — internal and external, including third parties, agents, recruitment and public funding — and records and manages these risks in the Institutional Risk Register in line with the Risk Management Policy and Framework.
4. Due diligence	The College applies risk-based due diligence to those who perform, or will perform, services for or on its behalf, including suppliers, agents, partners and recruitment intermediaries.
5. Communication and training	This policy is communicated to all staff and relevant third parties, forms part of induction, and is reinforced through training and awareness so that individuals understand the risks and their responsibilities.
6. Monitoring and review	The College monitors the effectiveness of its anti-bribery procedures, reviews them in light of experience and legal change, and reports to the Audit and Risk Committee.

8. Gifts and hospitality

The giving and receiving of proportionate gifts and hospitality, where nothing is expected in return and it is properly recorded, can help form positive relationships and does not constitute bribery. Gifts include money, goods (such as flowers, vouchers, food, drink or event tickets when not used in a hosted business context), services or loans given or received as a mark of friendship or appreciation. Hospitality includes entertaining, meals or event tickets used in a hosted business context; hospitality becomes a gift if the host is not present. No gift should be given, nor hospitality offered or accepted, by an employee or anyone working on the College's behalf without prior written approval from Human Resources. A register is maintained of every instance in which gifts or hospitality are given or received: any gift with a value above £30 should be recorded, and the cumulative total received from any one source should not exceed £200 in a calendar year.

9. Facilitation payments and kickbacks

The College does not make, and will not accept, facilitation payments or “kickbacks” of any kind. If an individual is asked to make such a payment, or is offered one, they must refuse (unless their immediate personal safety is in jeopardy) and report the matter at the earliest opportunity in accordance with Section 11.

10. Political and charitable donations

The College does not make political donations. Charitable donations and sponsorship are permitted only where they are lawful, transparent, properly authorised and recorded, and made to bona fide organisations — and never as a means of improperly obtaining or retaining business or an advantage.

11. Reporting concerns

If an individual is offered a bribe, a bribe is solicited from them, or they suspect that an act of bribery or attempted bribery has taken place — even if they are not personally involved — they must report it promptly to the Provost or the Head of HR, and may be asked to provide a written account. Any such disclosure is treated under, and protected by, the College’s Whistleblowing Policy, which sets out confidential internal and external reporting routes (including to the Audit and Risk Committee and, where appropriate, prescribed persons such as the Office for Students). No individual will suffer detriment for raising a genuine concern in good faith.

12. Tuition fees, refunds, sponsorships and donations

Tuition-fee payments, refunds, sponsorships and donations are subject to strict due diligence. Student-facing procedures are aligned with recruitment-compliance requirements and reported to the Marketing and Admissions Committee, and refunds are made only to the original payer in line with the Refunds Policy. These controls protect students, the integrity of recruitment, and the proper use of public funds.

13. Criminal offences and consequences

It is a criminal offence to offer a bribe; to accept a bribe; to bribe a foreign public official; to collude in or assist bribery; and, as a commercial organisation, to fail to prevent bribery. An individual found guilty of bribery may face up to ten years’ imprisonment and/or an unlimited fine, and the College could face prosecution and an unlimited fine. Under the College’s Code of Conduct, anyone suspected of bribery will be subject to the internal disciplinary procedure; bribery is treated as gross misconduct and may result in dismissal, or the cessation of the arrangement with a self-employed person, agency worker or contractor.

14. Duties and responsibilities

Table 2 — Roles and responsibilities

Role	Responsibility
Chief Executive Officer (Accountable Officer)	As Accountable Officer, has overall responsibility for safeguarding the funds, assets and resources entrusted to the College, including against fraud, bribery and corruption, and for ensuring adequate policies and controls are in place.
Executive Board	Provides governance and strategic direction for counter-fraud, bribery and corruption work, and ensures funds, people and assets are protected against criminal activity.

Role	Responsibility
Audit and Risk Committee	Provides oversight and assurance on the College's anti-bribery and anti-fraud arrangements and the related risk-register entries, and reports to the Board of Directors.
Head of HR	Leads on the operation of this policy and the appropriate use of the disciplinary procedure where an individual is suspected of bribery or corruption.
Head of Finance / MLRO	Leads on financial due diligence, anti-money-laundering arrangements and the annual AML risk assessment.
Head of Quality and Compliance	Owns fraud and public-funding risk under the Accountability Matrix and leads on regulatory compliance, including OfS condition E8.
Managers	Ensure local procedures are followed and kept under review, raise staff awareness, and report suspected bribery or corruption immediately without investigating it themselves.
All employees and third parties	Comply with this policy and the law, apply best practice in procurement, expenses and ethical conduct, and report suspected bribery or corruption.

14.1 Information management and technology

The Head of IT (or equivalent) will contact the Provost immediately where there is any suspicion that the College's ICT is being used for fraudulent purposes, and will ensure that an individual's physical and electronic access to ICT resources is suspended or removed where an investigation identifies that this is appropriate.

15. Risk management and oversight

Bribery, corruption and fraud risks are identified, assessed and managed through the Institutional Risk Register in line with the Risk Management Policy and Framework, with ownership of fraud and public-funding risk assigned to the Head of Quality and Compliance under the Accountability Matrix. The Audit and Risk Committee provides oversight and assurance on these arrangements on behalf of the Board of Directors, monitors system controls on an ongoing basis, and ensures that, where monitoring identifies deficiencies, recommendations and action plans are developed and implemented.

16. Monitoring, dissemination and review

Monitoring is essential to ensuring that controls remain appropriate and robust. The College reviews its system controls on an ongoing basis and addresses identified weaknesses through action plans. This policy is brought to the attention of all employees, forms part of induction, and is disseminated through awareness sessions, newsletters and the staff portal. The policy is reviewed at least every three years, or sooner if appropriate (for example following changes in legislation or regulatory requirements), with updates reported to the Academic Board and assurance provided to the Audit and Risk Committee.

17. Relationship to other policies

This policy should be read with the Risk Management Policy and Framework, the Whistleblowing Policy, the Fraud Response Procedure and Fraud and Public Funding Declaration, the Conflicts of Interest Policy, the Procurement Policy and the Refunds Policy, which together form the College's framework for integrity, the prevention of fraud and bribery, and the protection of public funds.

Supporting statement — Equality and Human Rights

UK Management College recognises that some sections of society experience prejudice and discrimination. The Equality Act 2010 recognises the protected characteristics of age, disability, sex, race, religion and belief (or lack of belief), sexual orientation, gender reassignment, pregnancy and maternity, and marriage and civil partnership status, and requires regard to socio-economic factors. The College is committed to promoting and advancing equality, removing and reducing discrimination and harassment, and fostering good relations, both in the provision of its services and in its role as an employer. The College believes that all people have the right to be treated with dignity and respect, and is committed to the elimination of unfair and unlawful discriminatory practices. The College is also aware of its duties under the Human Rights Act 1998 and is committed to carrying out its functions and delivering its services in line with a human-rights-based approach.