



**University of the
Built Environment**
EST. 1919

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Anti- Bribery Policy

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Document History

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1. INTRODUCTION

- 1.1 University of the Built Environment is committed to implementing and enforcing effective systems to counter bribery. The University does not tolerate, permit, or engage in bribery, corruption, or improper payments of any kind in our business dealings, in the UK or anywhere else in the world, both with public officials and people in the private sector. This Policy sets out our comprehensive approach to preventing bribery.
- 1.2 University of the Built Environment officers, employees and other members of the University must act with honesty and with integrity, and comply with this Policy, our procedures and applicable laws at all times during the course of carrying out business and regardless of their seniority.
- 1.3 We expect our business partners, customers, suppliers and those who perform services for, or on, our behalf (referred to in this Policy as “associated persons”) to adopt and adhere to the principles of this Policy, and to have equivalent standards and policies in place.
- 1.4 This Policy requires that employees and associated persons must not either directly or indirectly:
 - 1.4.1 Offer, promise, give, solicit or accept any bribe, either in cash or any other form of inducement, to or from any person or company, wherever they are located and whether they are a public official or body, or private person or company;
 - 1.4.2 Gain or retain any commercial, contractual or regulatory advantage through unethical or illegal means when conducting business on behalf of the University;
 - 1.4.3 Assist or facilitate the above conduct in any way.

2. POLICY AIM

- 2.1 The purpose of this policy is to set out the responsibilities of the University and those working for us in observing and upholding our position on bribery, and to provide information and guidance to employees on how to recognise and deal with bribery issues. This Policy ensures the University has reasonable procedures in place to prevent bribery (under the Bribery Act 2010).
- 2.2 This policy applies to all employees and to temporary workers, consultants, contractors, agents and agency workers acting for, or on behalf of, the University (“associated persons”) within the UK and overseas.
- 2.3 This Policy applies to all of the University’s activities and operations, and to all of its dealings and negotiations with third parties in all countries in which its employees and associated persons operate. All associated persons working on behalf of, under contract from or in collaboration with any part of the University or with its employees are expected to comply with the principles of this Policy. This includes sales agents as appropriate.

3. WHAT IS BRIBERY AND CORRUPTION?

- 3.1 Bribery is a criminal offence in most countries in the world, and the penalties for committing bribery offences can be severe including periods of imprisonment and unlimited fines.
- 3.2 The UK's Bribery Act 2010 is one of the most comprehensive anti-bribery laws in the world. It applies to UK incorporated businesses and UK nationals and also to any acts amounting to a bribery offence that occur in the UK. Importantly the Bribery Act can also apply to acts of bribery by UK nationals and businesses outside of the UK, and UK businesses can be held criminally liable in the UK for failing to prevent bribery in and outside of the UK by its associated persons. Even if paying a bribe is a customary practice in another jurisdiction, this is not a defence under UK law.
- 3.3 An 'associated person' is someone who provides services to the University or acts on the University's behalf and could be an employee of any type, consultants, agents and other forms of intermediaries. Undergraduate and postgraduate students are not normally considered as associated persons, unless they are themselves contracted by the University to provide a service. However, research students are likely to be considered as associated persons in respect of the conduct of their research and for activities such as fieldwork.
- 3.4 Acts of bribery or corruption are typically designed to influence an individual in the performance of their duties and to act in a way contrary to how their employer, their organisation or the public would expect them to act. Corruption is the misuse of public office or a business position for private gain. Committing an act of bribery or corruption is a criminal offence.
- 3.5 A bribe is the offer, promise or giving of a financial or other advantage with the intention of inducing another person to do something improperly in carrying out work or performing a public function, or to reward that person for doing so. A bribery offence is also committed if a business or individual requests, agrees to accept or receives a financial or other advantage intending that work or a public function will be carried out improperly as a result. It is also an offence to offer, promise or give a financial or other advantage to someone (or to request or receive) when a business or individual knows or believes that acceptance of the advantage is in itself improper, for example because the relevant rules of that person's employment prohibit them from accepting gifts in the context of their employment.
- 3.6 Bribes usually take the form of improper payments or personal commissions. They can, however, take on many different shapes and forms, such as gifts, excessive hospitality, job offers, loans, holidays, the carrying out of works for an individual in a personal capacity, reimbursement of travel and other expenses and improper charitable or political donations.
- 3.7 It is not necessary for a bribe to be paid or for an improper act to happen for wrongdoing to occur. Those offering, promising, or requesting a bribe can commit criminal offences.

- 3.8 Bribery also includes “facilitation” or “grease” payments, which are typically small unofficial payments paid to speed up an administrative process or secure a routine government or local authority action by an official. Facilitation payments are more common outside of the UK, but it is possible that they could arise in the UK. Facilitation payments are treated as bribes by the Bribery Act and are prohibited by this Policy. If an employee is asked to make a facilitation payment, they should refuse to do so and report the matter to their line manager or the University Secretary immediately.
- 3.9 Under UK law (UK Bribery Act 2010), bribery and corruption is punishable for individuals by up to ten years’ imprisonment. If the University is found to have taken part in the corruption or lacks adequate procedures to prevent bribery, it could face an unlimited fine and be excluded from tendering for Government contracts.
- 3.10 The University can also be criminally liable for failing to prevent bribery. This means the University can be guilty of an offence if bribes are offered, promised or paid by an associated person in order to win or retain business or an advantage in business. The University has a defence to this criminal offence if it can demonstrate that it had adequate procedures in place to prevent bribery, and this Policy forms part of these procedures.

4. POLICY PRINCIPLES

- 4.1 This Policy applies to all of the University’s activities and operations, and to all of its dealings and negotiations with third parties in all countries in which its employees and associated persons operate. All associated persons working on behalf of, under contract from or in collaboration with any part of the University or with its employees are expected to comply with the principles of this Policy.
- 4.2 The University has a zero-tolerance approach to bribery and corruption. All such conduct is strictly prohibited. The University will rigorously enforce this policy and will not conduct business with service providers, agents or representatives that do not support this objective.
- 4.3 The University is committed to acting professionally, fairly and with integrity in all of its dealings wherever it operates and it expects the same from all of the employees and those individuals or organisations that it contracts or engages with. It is therefore the University’s policy to conduct all aspects of its business in an honest, ethical and sustainable manner at all times.
- 4.4 The University is committed to upholding all laws relevant to countering bribery and corruption in all the jurisdictions in which it operates and expects employees to do so too. The University will address risks of bribery by ensuring adequate, reasonable and proportionate prevention procedures are developed and implemented to mitigate them.
- 4.5 Arrangements with third parties will be subject to clear contractual terms, including specific provisions requiring them to comply with minimum standards and procedures relating to bribery and corruption. The University will not engage, or continue business

with, any individual or third party who it knows or reasonably suspects of engaging in bribery or corruption.

- 4.6 No employees or associated persons will suffer any penalty or other adverse consequences for refusing to pay bribes even if a refusal may result in loss of business or a delay in proceedings.
- 4.7 The prevention, detection and reporting of bribery are the responsibility of all employees. They should raise any concerns or allegations of bribery or corrupt activity with their line manager, the University Secretary or the Deputy Vice-Chancellor.

5. EMPLOYEE RESPONSIBILITY

5.1 All employees and associated persons must:

- 5.1.1 ensure that they read, understand and comply with the information contained in this policy and with any training or other anti-bribery and corruption information provided by the University.
- 5.1.2 ensure that they do not engage in any form of bribery, either directly or through any third party.
- 5.1.3 avoid any activity that might lead to, or suggest, a breach of this policy.
- 5.1.4 notify their line manager or the University Secretary as soon as possible if they believe or suspect that a conflict with, or breach of, this policy has occurred or may occur in the future.
- 5.1.5 notify their line manager or the University Secretary if they are offered a bribe by a third party, are asked to make a bribe, suspect that they may be bribed or asked to bribe a third party or believe that they are a witness to bribery.

5.2 Record Keeping

- 5.2.1 All expenses claims relating to hospitality or gifts given or received must be submitted in accordance with the University's Expenses Policy and must record the reason for expenditure.
- 5.2.2 All hospitality or gifts accepted or offered must be declared and recorded in the University's gifts and hospitality register, in accordance with the provisions below.

5.3 Due Diligence

- 5.3.1 The University will apply comprehensive due diligence procedures, taking a proportionate and risk-based approach, in respect of persons and organisations that perform or will perform services for or on behalf of the University to mitigate identified bribery risks.

- 5.3.2 Where appropriate, line managers or their nominee will complete sufficient due diligence when entering into arrangements with others to ensure they are not acting corruptly and to periodically monitor their performance to ensure ongoing compliance. They will take appropriate action in response to any information uncovered as a result of due diligence which gives rise to concern and report any such information to a member of the senior management team.
- 5.3.3 Due diligence procedures include:
- (a) Verifying the identity of third parties, including checking registration details on Companies House and other official registers.
 - (b) Conducting beneficial ownership checks to identify the individuals who ultimately own or control corporate partners and suppliers.
 - (c) Verifying that third parties have genuine registered offices and are not using accommodation addresses for improper purposes.
 - (d) Checking the background, experience and reputation of third parties.
 - (e) Obtaining references and financial information.
 - (f) Checking for any links to public officials, political organisations, or individuals with adverse media or sanctions listings.
 - (g) Ensuring that appropriate anti-bribery clauses are included in contracts.

5.4 Corporate Hospitality

- 5.4.1 The University accepts normal and appropriate gestures of hospitality and goodwill (whether given to/received from third parties) so long as the giving or receiving of such hospitality meets the following requirements:
- (a) It is not made with the intention of influencing the party to whom it is being given, to obtain or reward the retention of a business or a business advantage, or as an explicit or implicit exchange for favours or benefits.
 - (b) It is not made with the suggestion that a return favour is expected.
 - (c) It is in compliance with local law.
 - (d) It is given in the name of the University, not in an individual's name.
 - (e) It does not include cash or a cash equivalent (e.g. a voucher or gift certificate).

- (f) It is appropriate for the circumstances (e.g. giving or receiving small gifts around Christmas or as a small thank you to particular individuals as a professional courtesy).
 - (g) It is of an appropriate type and value and given at an appropriate time, taking account of the reason for the gift.
 - (h) It is given/received openly, not secretly.
 - (i) It is not selectively given to a key, influential person, clearly with the intention of directly influencing them.
 - (j) It is not in breach of any applicable professional codes of conduct.
- 5.4.2 Where it is appropriate to accept hospitality, reasonable and proportionate hospitality is allowed to also be given provided it is given in the name of the University and not an individual employee and that the hospitality is not intended to secure an advantage for the giver or to place the employee under an improper obligation.
- 5.4.3 Hospitality should not be accepted where it could be perceived that it is intended to, or could, improperly influence a decision relating to the University's business relationships or teaching, learning, research or consultancy activities, in particular where there is a procurement exercise underway.
- 5.4.4 The test to be applied when considering whether hospitality is bona fide is whether the hospitality is reasonable and proportionate and in the course of a genuine business relationship. It is not acceptable for employees (or anyone for whom they are responsible) to accept compensation or rewards for performing their official duties from anyone other than the University. Employees must not accept hospitality or gifts which have an improper purpose or could be reasonably perceived to have an improper purpose.

6. GIFTS

- 6.1 Gifts given or received must meet the same criteria as hospitality set out in section 5.4 above. Employees should not accept gifts of any significant value from any actual or potential business partner, supplier or customer. Where there is any doubt as to whether acceptance of a gift would be appropriate, the matter should be referred to a line manager or to the University Secretary.
- 6.2 Gifts of cash or cash equivalents (such as vouchers) must not be given or accepted under any circumstances.
- 6.3 Promotional gifts of low value such as branded stationery may be accepted and need not be declared. Gifts of a value above £30 must be reported to the University Secretary and may not be accepted without approval. A gift offered and then refused due to its value must also be reported to the University Secretary.

- 6.4 The University Secretary maintains a gifts and hospitality register which records:
- The date of the gift/hospitality;
 - Details of the gift/hospitality;
 - The estimated value;
 - The identity of the person or organisation providing or receiving the gift/hospitality; and
 - The relationship between the parties.
- 6.5 In all cases where gifts or hospitality are accepted or offered, the circumstances must be such that they could not be reasonably construed as a bribe.
- 6.6 The University Secretary must approve the offering of all business gifts aimed at thanking customers and suppliers prior to them being given.

7. POLITICAL AND CHARITABLE DONATIONS

- 7.1 The University does not make donations to political parties or political organisations.
- 7.2 The University may make charitable donations that are legal and ethical under local laws and practices. However, no donation must be offered or made on behalf of the University without the prior approval of the University Secretary or their nominee.
- 7.3 All charitable donations must be transparent and properly recorded in the University's accounts. Employees must not make charitable donations on behalf of the University to facilitate or conceal acts of bribery.

8. RECRUITMENT AND SECONDMENTS

- 8.1 The University operates transparent recruitment processes based on merit and equal opportunity principles.
- 8.2 Employees must not offer employment or secondment opportunities to family members or associates of existing or potential business partners, customers or suppliers as an inducement or reward for providing business or business advantage to the University.
- 8.3 Any request for the University to employ or provide opportunities for family members or associates of business partners must be referred to the University Secretary for consideration.
- 8.4 All recruitment and selection decisions must be made in accordance with the University's Recruitment and Selection Policy and procedures.

9. NON-COMPLIANCE

- 9.1 Any member of employees who breaches this policy will be subject to the University's Disciplinary Procedure. A breach of this policy may constitute gross misconduct and could result in summary dismissal.
- 9.2 Breaches of the Bribery Act 2010 and other relevant legislation may constitute criminal offences. The University reserves the right to report any matter to the police, the Serious Fraud Office (SFO), the National Crime Agency (NCA) and other relevant authorities where appropriate. The University recognises the benefits of self-reporting and cooperation with investigations and will consider such action in appropriate circumstances. Employees who breach this policy may be personally liable to prosecution and, on conviction, may face imprisonment of up to 10 years and/or unlimited fines.
- 9.3 The University will ensure it takes appropriate action in response to any reported incidents of bribery. Investigations will follow the principles and procedures set out in the University's disciplinary procedures and relevant fraud policies. The University may conduct internal investigations and will cooperate fully with external investigations by law enforcement and regulatory authorities. Failure to comply with this Policy will lead to disciplinary action and proven allegations will result in summary dismissal. In relevant cases the police, Serious Fraud Office (SFO), National Crime Agency (NCA) and other authorities will be informed as economic crime offences carry criminal liability for individuals and organisations, with sanctions including unlimited fines and imprisonment of up to 10 years.
- 9.4 Employees are encouraged to raise concerns about any issue or suspicion of bribery or corruption at the earliest possible stage. Anyone who has concerns about bribery or corruption should raise them with their line manager, the University Secretary, or via the University's Whistleblowing Policy if they wish to do so confidentially.
- 9.5 The University is committed to ensuring that employees have a safe, reliable and confidential way of reporting any suspicious activity. Employees who raise concerns or report wrongdoing can do so without fear of reprisal and will be protected in accordance with the University's Whistleblowing Policy.

10. RISK ASSESSMENT

- 10.1 The University Secretary is responsible for ensuring risks are assessed and appropriate action taken to comply with this Policy. The University will conduct periodic assessments of the potential risks of bribery and corruption in its operations, taking into account factors such as:
- 10.1.1 The countries and sectors in which the University operates;
- 10.1.2 The nature of dealings with public officials and government bodies;

- 10.1.3 The use of third parties, agents and intermediaries;
- 10.1.4 The value and complexity of transactions;
- 10.1.5 Areas of the business where there are opportunities for bribery;
- 10.1.6 Money laundering risks, particularly in relation to international student fee payments;
- 10.1.7 Risks associated with international partnerships and collaborations;
- 10.1.8 Intellectual property and research integrity risks; and
- 10.1.9 Risks specific to the higher education sector and regulatory environment.

11. COMMUNICATION AND TRAINING

- 11.1 Line managers or their nominee are responsible for ensuring the communication of the University's Anti-Bribery and Corruption Policy and other relevant policies to associated persons. Line managers will also monitor and review their procedures and action plans to ensure their suitability, adequacy and effectiveness in relation to this Policy and implement improvements as appropriate.
- 11.2 The University will provide training on this Policy and on recognising and preventing bribery to all employees as part of induction and on a regular ongoing basis.
- 11.3 The University's zero-tolerance approach to bribery and corruption will also be communicated to all business partners, suppliers and contractors.

12. MONITORING AND REVIEW

- 12.1 The University Secretary will monitor the effectiveness and review the implementation of this Policy, regularly considering its suitability, adequacy and effectiveness in preventing bribery. Monitoring will include analysis of incidents, near-misses, whistleblowing reports, and audit findings.
- 12.2 Internal control systems and procedures will be subject to regular audits to provide assurance that they are effective in preventing bribery.
- 12.3 All employees are responsible for the success of this Policy and should ensure they use it to disclose any suspected wrongdoing.
- 12.4 Employees are invited to comment on this Policy and suggest ways in which it might be improved. Comments, suggestions and queries should be addressed to the University Secretary.

13. **USEFUL REFERENCES**

- 13.1 Bribery Act 2010 Guidance published by the Ministry of Justice:
<http://webarchive.nationalarchives.gov.uk/+http://www.justice.gov.uk/guidance/docs/bribery-act-2010-guidance.pdf>
- 13.2 Transparency International UK: <https://www.transparency.org.uk/>
- 13.3 Universities UK guidance on ethical conduct and governance in higher education.
- 13.4 The following related policies:
 - (a) Whistleblowing Policy
 - (b) Fraud Policy
 - (c) Expenses Policy
 - (d) Procurement Policy
 - (e) Conflict of Interest Policy
 - (f) Employees Code of Conduct
 - (g) Disciplinary Procedure