

Counter Fraud, Anti-Bribery & Corruption Policy

Policy Statement and Commitment to Integrity and Compliance

1. The University is committed to upholding high standards of **honesty** and **integrity** in its operations. The University has a **zero-tolerance** approach towards fraud and bribery. Any attempts or acts of fraud or bribery are treated as serious disciplinary and/or criminal offences and are investigated promptly and rigorously.
2. The University maintains effective risk management and internal control arrangements to reduce the likelihood of fraud and bribery and will take (and record) proportionate measures to mitigate risks. The University seeks to ensure that its prevention procedures are communicated, embedded and understood throughout the institution, through internal and external communication, policy delivery and training.
3. All instances of actual, attempted, or suspected fraud and bribery will be investigated in line with this policy and associated [procedures](#). The University will seek to recover any losses and take steps to prevent recurrence.

Purpose and Scope

4. The purpose of this Policy is to:
 - (a) Define fraud and bribery offences under legislation (including examples of risks in Higher Education settings) and ensure compliance with legal requirements.
 - (b) Uphold the University's values of integrity and transparency by promoting the detection and prompt investigation of fraud and bribery.
 - (c) Implement and maintain reasonable procedures to prevent fraud and bribery, proportionate to the size, resources, and complexity of our operations.
 - (d) Protect the University's finances, assets, and reputation.
 - (e) Encourage the reporting of fraud and bribery, in line with the University's procedures, and the reporting of related risks or gaps in control arrangements.

Application

5. The Policy applies to all **colleagues**¹, **governors** and **students**² of the University. This Policy also extends to "**associated persons**", by which we mean individuals or bodies **associated** and **acting in connection with the University's business** (e.g., performing or providing services for or on behalf of the University) which may include University subsidiaries, contractors, recipients or providers of public funds, partners, collaborative arrangements, joint ventures, agents and advisors etc.
6. This Policy applies to all University activities (including those provided on the University's behalf), including overseas operations and partnerships. Fraud or bribery by non-UK associated persons may still be liable where there is a UK connection. All international partners, agents, and contractors must uphold equivalent standards and comply with the University's counter-fraud and anti-bribery requirements.

Why does fraud and bribery prevention matter?

7. As a not-for-profit institution advancing education for the public benefit, regulated by the Office for Students (OfS) the University must ensure appropriate financial and management controls to safeguard public funds and University assets. Fraud and bribery can divert resources, damage reputation, and undermine strategic objectives.

¹ Including officers, employees (whether permanent, fixed term or temporary), workers, trainees, seconded staff, agency staff, volunteers, interns or any other person working in any context within the University.

² Including apprentices registered on University's degree apprenticeship programmes and those at partner institutions registered as LBU students.

Definitions

8. For the purposes of this Policy, the following terms are defined as follows, but may change or be extended with changes in the law:

Term	Definition
Fraud	Committing fraud by: (a) false representation , (b) failing to disclose information , and (c) abuse of position (d) obtaining services dishonestly (<i>Fraud Act 2006, s.1-4, 9, and 11</i>), (e) false accounting and (f) false statements by company directors etc. (<i>Theft Act 1968, s.17 and 19</i>), and (g) conspiracy to defraud (<i>common law offence preserved by Criminal Law Act 1977, s.5(2)</i>).
Bribery	Offering, promising, or giving a financial or other advantage to (i) induce a person to perform improperly a relevant function or activity, (ii) reward a person for improper performance, or (iii) knowingly allow the improper performance or activity (<i>Bribery Act 2010, s.1</i>).
Corruption	Offering, giving, receiving or soliciting an advantage to induce an illegal, unethical or a breach of trust (<i>Common law and historic statutory formulation; now subsumed within bribery offences</i>).
Irregularity	Breaching the standards, rules, or laws governing the handling of public funds, whether deliberate (e.g., fraud, theft, bribery) or accidental (e.g., error, mismanagement).
Money Laundering	Concealing, arranging, acquiring, using, or possessing criminal property, attempting or inciting such acts, or helping or enabling others to do so (<i>Proceeds of Crime Act 2002, s.340(11)</i>).
Theft	Dishonestly appropriating property belonging to another with the intention of permanently depriving them of it (<i>Theft Act 1968, s.1</i>).
Inappropriate use of relevant public funds	Means either failing to comply with legally binding funding conditions or receiving funding when eligibility criteria are not met, except where the law explicitly allows estimates or projections in determining entitlement. (<i>OfS Fraud and inappropriate use of public funds</i>).

See Annex 2, Prohibited Conduct.

Legal and Regulatory Framework

9. Individuals can be prosecuted if they are found guilty of fraud or bribery offences. The maximum sentence for fraud in the UK is 10 years' imprisonment for individuals found guilty of committing such an offence; organisations are liable to unlimited fines. Criminal offences include:
- Fraud Act 2006 - fraud, fraud by false representation, failing to disclose information, by abuse of position, or obtaining services dishonestly.
 - Theft Act 1968 - false accounting, false statements by directors.
 - Criminal Law Act 1977 - conspiracy to defraud
 - Companies Act 2006 - fraudulent trading.
 - Bribery Act 2010 - active bribery, passive bribery, bribing foreign officials, failure to prevent.
 - Proceeds of Crime Act 2002 - money laundering offences.
 - Money Laundering Regulations 2017.
 - Economic Crime and Corporate Transparency Act (2023) (ECCTA)³ – effective from 1 September 2025, liability for “failure to prevent fraud” unless reasonable preventative procedures are in place.
 - Office for Students (OfS) - regulatory reporting requirements, including Reportable Events.
10. The criminal act is the attempt to deceive; accordingly attempted fraud or bribery is treated as seriously as completed acts. In addition, aiding, abetting, counselling, or procuring the commission of any of the listed offences also constitutes a fraud offence.
11. Staff and associated persons involved in international /overseas partnerships should also consider counter fraud and anti-bribery guidance applicable in the relevant jurisdictions, including the **US Foreign Corrupt Practices Act (FCPA)** and local anti-corruption legislation, where relevant to overseas activities.

³ Leeds Beckett University falls **within the scope** of the ECCTA definition of a “relevant body” or “large organisation”.

Responsibilities

12. Staff have been deployed to have responsibility for overseeing policies, processes, training and other arrangements, and for oversight of those staff.

Role	Responsibilities
All Staff and Associated Persons	<ul style="list-style-type: none"> Act honestly and with integrity, and declare any conflict of interest, gifts or hospitality that could influence, or appear to influence, operations or decision-making, in accordance with the University's Conflict of Interest Policy and Financial Regulations. Individuals' conduct should not give rise to suspicion of a conflict between their official duties and private interests. Comply with this policy and any associated procedures and guidance and follow the University's Financial Regulations and procurement procedures. Be vigilant to signs of fraud and bribery and promptly report concerns or gaps in controls, assisting with investigations as required. Staff must complete relevant mandatory training.
Award of contracts / appointment of agents	Must declare conflicts of interest which may be perceived to influence decision-making (refer to the Conflicts of Interest Policy) and conduct due diligence to prevent bribery or fraud.
Managers	<ul style="list-style-type: none"> Provide proportionate supervision and promote awareness, ensuring that staff are aware of this policy and complete mandatory training. Embed fraud preventative measures in their areas. <p>Further information is set out in the Guidance for Individuals and Managers.</p>
Vice Chancellor	Must ensure that material adverse events (including suspected or actual fraud or financial irregularity) are reported to the OfS in accordance with the Reportable Events Procedure .
Finance Director	Overseeing the development, implementation and maintenance of robust financial risk management, fair and transparent tender procedures, and internal controls that assist in the prevention and detection of fraud and bribery.
Registrar & Secretary	<ul style="list-style-type: none"> Implementing, maintaining, and reviewing this Policy to secure compliance with the law. Overseeing investigations and maintaining records, making referrals to external bodies where appropriate. Reporting to the Audit & Risk Committee.
Head of Internal Audit	<ul style="list-style-type: none"> Monitoring the University's systems of internal and risk management controls and governance arrangements which includes the adequacy of the counter fraud measures implemented by the University. Rigorously testing the University's approach to fraud and bribery management arrangements as part of the programme of internal audits. Liaising with the Registrar & Secretary and Finance Director as required on investigations and providing reports on material incidents to the Audit & Risk Committee.
Subsidiaries	Each subsidiary must establish fraud and bribery prevention procedures and designate responsible individuals for oversight.
Board of Governors / Audit & Risk Committee	<ul style="list-style-type: none"> The Board of Governors is ultimately responsible for ensuring the University maintains robust fraud and bribery prevention policies and oversight mechanisms. The Audit & Risk Committee, acting under delegated authority from the Board, is responsible for approving the policies and monitoring their implementation. Reporting: Medium-risk cases (Level 2: £2k–£25k) and high-risk or material cases (Level 3: £25k+ or otherwise deemed significant) are reported individually throughout the academic year to the Audit & Risk Committee. All other matters are summarised collectively in the annual assurance report.
Governors	Governors must complete relevant mandatory training.

Prevention Measures and Reasonable Procedures

13. The University maintains robust internal controls and safeguards to detect, prevent and stop fraudulent or corrupt activity and detect indicators of fraudulent activity, demonstrating the implementation and effectiveness of its reasonable procedures to support compliance with ECCTA

requirements. The University regularly reviews these procedures to ensure they are proportionate, and effective.

14. These reasonable procedures are built on the following key principles designed to be proportionate, practical, accessible, and effectively embedded, reflecting the scale and complexity of the University's operations and the specific fraud and bribery risks identified:

Area	Key measures for preventing fraud and bribery
Integrity & Culture	Commitment to high standards of integrity and fostering a culture where members of the University feel empowered to report concerns. Zero-tolerance stance on fraud and bribery.
Governance & Oversight	Oversight delegated by the Board of Governors to the Audit & Risk Committee, with senior management commitment and leading local fraud prevention efforts. Internal Audit provides independent assurance on the adequacy and effectiveness of the University's fraud and bribery prevention controls, reporting findings to the Audit & Risk Committee.
Financial Controls	Robust controls and oversight of contracts, transactions, and high-risk business dealings, including technology-assisted monitoring as a proactive control.
Validation of data submissions	The University ensures that all data submitted to external bodies for public funding purposes is accurate, complete, and verifiable. Responsibilities, clear procedures, segregation of duties, robust IT, and managerial sign-off are in place to prevent errors, fraud, or bribery and reporting controls support ongoing monitoring, review, and remediation of any issues.
Student Registration Controls	Robust registration and enrolment processes ensure students meet required academic and language qualifications and genuinely intend to study, including where recruitment agents are used.
Due Diligence	Risk-based checks including on associated persons (third parties, contractors, and service providers) prior to engagement, including periodic certifications; enhanced scrutiny for high-risk engagements. Financial transactions are closely monitored according to established procedures. Appendix 1 sets out guidance on risk-based due diligence.
Regulatory & Statutory Compliance	Cross-referencing with tax, environmental, health and safety, and legal and regulatory requirements.
Policies & Guidance	Accessible policies and guidance supporting recruitment, marketing, and operational practices ensure staff, students, and governors follow Codes of Conduct and consistent practices. Policies are continuously monitored and updated.
Communication & Awareness	Mandatory training, guidance, and ongoing communication to ensure staff, students, and associated persons understand risks and prevention measures.
Risk Management	Active risk assessment identifies areas vulnerable to fraud and bribery, with proportionate measures applied as part of the University's reasonable procedures. The Registrar & Secretary's Office maintains and keeps under review a University Fraud Risk Register to identify, assess and manage risks, including its likelihood, potential impact, assigned ownership, mitigation measures and status to support informed decision-making and compliance.
Response Procedures	Clear protocols for raising concerns, responding to suspected fraud or bribery incidents, conducting investigations, reporting findings, and updating controls.

15. The University **monitors and reviews** its prevention procedures continuously, updating controls based on lessons learned from incidents or regulatory / legal changes.

16. Members of the University should report any gaps in existing control arrangements.

Training and Awareness

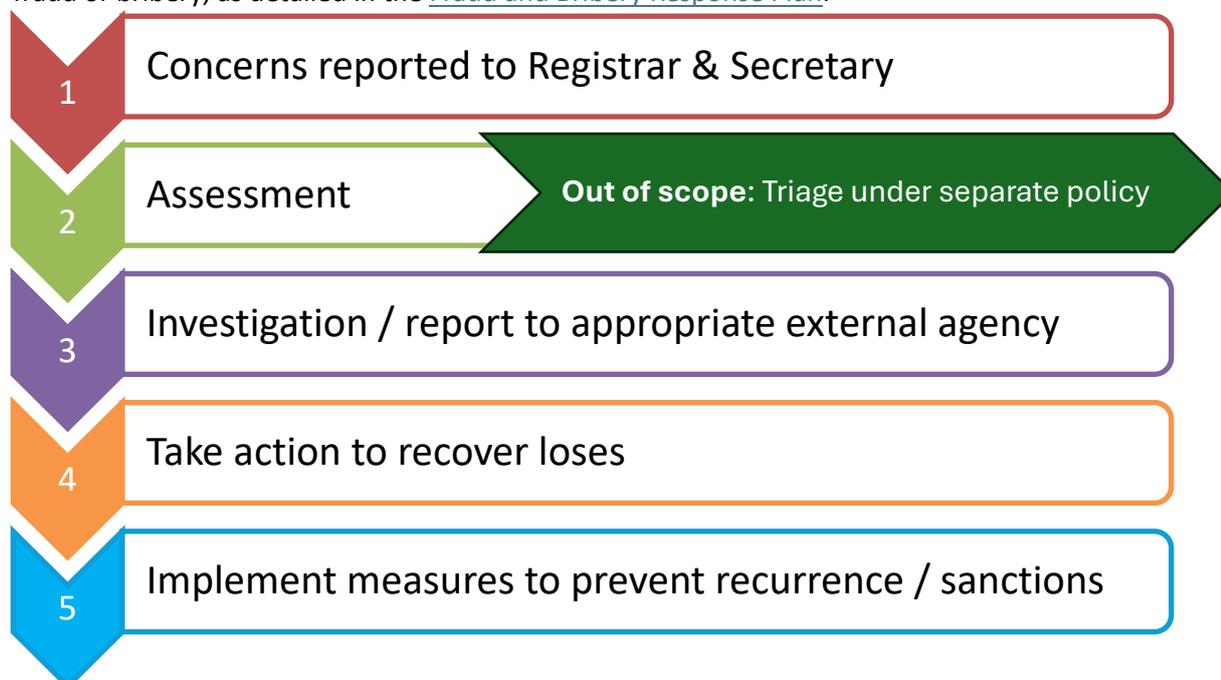
17. Communication and [policies](#) on fraud and bribery prevention, is published on the University's public-facing website and is made available to members of the University and individuals that carry out work for and on behalf of the University.
18. **Mandatory [fraud and bribery training](#)** relating to the awareness, detection, prevention and stopping of fraud, bribery and corruption **for relevant staff and governors** is implemented, monitored, refreshed periodically and reported to the Audit & Risk Committee. This ensures staff have the knowledge, skills and awareness needed to identify, prevent and report relevant fraud/bribery activity. Evidence of training is maintained to demonstrate compliance with the ECCTA's 'reasonable procedures' requirements.

Reporting and Investigation

19. Warning signs and examples of fraud (1) and bribery (2) are set out as annexes to this Policy.

20. All concerns relating to suspected fraud or a breach, or potential breach, of this Policy should be reported immediately to your line manager and where appropriate with the University [Registrar & Secretary](#). It is our Policy that no detrimental action will be taken against a person who reports a concern in good faith. Any person making false or malicious allegations, or with a view to personal gain, may be subject to disciplinary action.
21. Concerns can also be raised under the University's [Whistleblowing Policy](#) in the knowledge that they will be treated in confidence and in accordance with the Public Interest and Disclosure Act 1998.

The diagram below illustrates the process for reporting, investigating, and resolving suspected cases of fraud or bribery, as detailed in the [Fraud and Bribery Response Plan](#).



Confidentiality and Record Keeping

22. Reports will be handled confidentially and sensitively. Information will only be disclosed on a need-to-know basis to protect the integrity of investigations and the rights of those involved. All investigation documentation will be securely retained (in alignment with the University's Records Retention Schedule) to ensure evidence is preserved and to support any disciplinary or legal action.
23. All activities relating to fraud and bribery, including training, risk assessments, due diligence, investigations, and remediation actions, are documented and retained as evidence that reasonable procedures are in place and followed.

Investigating Fraud

24. The University's [Fraud and Bribery Response Plan](#) sets out how the University will investigate reported concerns. All allegations of fraud will be taken seriously and investigated promptly, proportionately, and impartially in line with the University's investigation protocols. The University will cooperate fully with law enforcement and regulatory bodies as required.
25. The University Executive Team will consider whether any concerns should be reported to the OfS in accordance with the [Reportable Events Procedure](#).

Consequences and Sanctions

26. Any individual found to have committed fraud or bribery will be subject to **disciplinary proceedings** under relevant policies and procedures, which may include dismissal (staff) or expulsion (students). Any **retaliation** against those raising concerns may itself be a disciplinary offence. **Contractors and associates** may also face sanctions such as termination of contracts or reporting to professional regulators. The University reserves the right to **report criminal offences to the appropriate authorities and pursue legal remedies**, including recovery of losses.

Remediation

27. Where fraud or bribery has occurred, appropriate measures will be taken to prevent recurrence, which may include improvements to policies and procedures, training, or other actions as needed to prevent recurrence, thereby demonstrating compliance with the ECCTA's 'reasonable procedures' requirements. Further information is set out in the [Fraud and Bribery Response Plan](#).

Support for Victims and Reporters

28. Staff should seek support from their line manager if they are affected by suspected or confirmed fraudulent activity. Our [Employee Assistance Programme](#) also offers support to staff.
29. Staff and students can seek confidential support via [Support Report Respect](#) or the University's wellbeing and counselling services. Staff and students may also seek support from external organisations, including:
 - **Action Fraud** - for reporting suspected fraud or cybercrime: www.actionfraud.police.uk
 - **Citizens Advice** - for advice on financial or legal matters: www.citizensadvice.org.uk
 - **The Fraud Advisory Panel** - for guidance on preventing and responding to fraud: www.fraudadvisorypanel.org

Related Documents

30. The following policies and documents complement and support this policy and should be read in conjunction with it:
 - [Fraud & Bribery Response Plan](#) - Details specific steps to respond to incidents or allegations of fraud and bribery.
 - [Financial Regulations](#) and [Procurement procedures](#) - Establish controls over financial transactions, third-party engagements and declaring gifts and hospitality.
 - [Conflict of Interest Policy](#) - Details the process for declaring potential or actual conflicts of interest that may influence, or appear to influence, decision-making.
 - [Whistleblowing Policy](#) - Provides detailed procedures allowing individuals to confidentially report concerns about misconduct, unethical behaviour or regulatory breaches, while ensuring protection against retaliation.
 - **Cybersecurity and IT Fraud** - The University recognises IT systems as potential targets for fraud. Staff, students, and associated persons must follow IT security policies, use secure access controls, and report suspicious activity. Cybersecurity measures, monitoring, and training help prevent and detect IT-related fraud, with incidents reported promptly to the IT Security Team and Finance.

POLICY IMPLEMENTATION

Publication	Public website
Embedding	The University will ensure that this Policy is effectively communicated and embedded into practice, including training and integration into local procedures / risk management.
Reporting	<ul style="list-style-type: none"> The Audit & Risk Committee oversees the process through annual reports and in-year case updates (as appropriate to the level of case). The Policy is approved by the Audit & Risk Committee. Annual reports to the Audit & Risk Committee include data on compliance with mandatory training requirements
Record keeping	Records will be retained in accordance with the University's Records Retention Schedule and relevant data protection requirements.

Policy	Counter Fraud, Anti-Bribery & Corruption Policy			
Organisation	Leeds Beckett University			
Sensitivity	Public			
Status	Published			
First effective from	22-01-2021 [first publication date]			
Last review date	14-11-2025 [any previous versions are withdrawn]			
Next review date	+3 years from last date of approval [11-2028], or sooner following incidents or legal/regulatory changes			
Policy Owner	Registrar & Secretary			
Key Contacts	Policy & Project Officer			
Developed in consultation with	Financial Services, Legal Services			
Target audience	All members of the University and others performing work for or on behalf of the University			
Approved by	Audit & Risk Committee			
Endorsed by	University Executive Committee			
Internal links	<ul style="list-style-type: none"> Fraud & Bribery Response Plan Guidance for Individuals and Managers on Concerns of Fraud and/or Bribery Counter Fraud and Anti-Bribery One-Minute Guide Protocols for handling fraudulent academic confirmation / qualifications in relation to students/graduates 			
Version History	Version	Date	Approved by	Summary of major changes
<i>[a whole number represents a full review]</i>	1.0	22-01-2021	Audit Committee	First publication of separate policies
	1.1	03-09-2021	Audit Committee	
	2.0	28-04-2023	Audit Committee	
	2.1	14-02-2025	Audit Committee	
	3.0	14-11-2025	Audit & Risk Committee	Combined policy / ECCTA

Appendix 1: Guidance for Risk-based Due Diligence

Annex 1: Fraud - Key Risks and Warning Signs

Annex 2: Bribery - Prohibited Conduct, Key Risks and Warning Signs

Appendix 1: Guidance for Risk-based Due Diligence

Appendix 1 provides guidance on risk-based due diligence for partnerships, contracts, and third parties. These measures support the University's broader Counter Fraud, Anti-Bribery & Corruption Policy and demonstrate compliance with the ECCTA requirement for 'reasonable procedures'.

High-Risk Activities

1. Activities considered higher risk require **increased and ongoing scrutiny**, particularly where:
 - Third parties act on behalf of the University;
 - The transaction or partner is [located in a jurisdiction with a higher prevalence of corruption](#).

Due Diligence for Partnerships and Contracts

2. Due diligence checks ensure that **adequate counter-fraud and anti-bribery measures** are in place. The risk of fraud, bribery, and corruption must be considered during due diligence before entering into any business or academic partnership, contract, or appointment of third parties. Due diligence procedures shall be **proportionate** to the risk associated with particular transactions, relationships, and activities, and shall be carried out by colleagues responsible for:
 - Appointing **suppliers, consultants, intermediaries, and subcontractors** delivering University services or research;
 - Managing **partnership agreements**;
 - Engaging **philanthropic donors or sponsors** linked to decision-making;
 - Working with **overseas agents** or **student recruitment representatives**;
 - Collaborating with **joint ventures and consortia members** where shared decision-making occurs.

Anti-Money Laundering (AML)

3. While the University's overall exposure to money laundering is low, compliance with **AML requirements** is an important part of the wider fraud, bribery, and financial crime prevention framework. Controls extend beyond bribery and address risks such as:
 - Concealment of criminal proceeds;
 - Misuse of University financial systems.
4. The University maintains a **zero-tolerance approach** to money laundering, in compliance with applicable UK AML laws and engagement with supervisory authorities. Adherence to AML requirements is integral to protecting the University's integrity and reputation, even where overall exposure is low.

Gifts and hospitality

5. Under the **Bribery Act 2010**, it is an offence for **University members (or their family)** to accept gifts, hospitality, or other considerations **corruptly** as an inducement or reward for acting or refraining from acting in an official capacity. Staff must comply with the University's [Financial Regulations](#) (para B19) regarding gifts and hospitality. Failure to declare or improper acceptance may constitute fraud and will be investigated under this Policy. Staff must consider whether acceptance could create a **conflict of interest**.

Conflicts of Interest

6. Outside interests, or those of close personal connections, may sometimes create actual or perceived conflicts of interest. The [Conflicts of Interest Policy](#) sets out what constitutes a conflict of interest the procedures for the declaration (at the earliest opportunity) and management of conflicts of interest, including colleagues with responsibility for the award of contracts (required under the Procurement Act) and appointment of agents.
7. The conduct of individuals should not create suspicion of any conflict between their official duty and their private interest.

Facilitation payments

8. Facilitation payments are small payments made to expedite routine government actions that are not legally required. While common in some regions, such payments are illegal under UK law for UK-based organisations.
9. The University **prohibits facilitation payments** by or on its behalf. If asked to make such a payment, staff must:
 - Consider the purpose of the payment and ensure the amount is proportionate;
 - Request a formal invoice or statement detailing the payment;
 - Act within managerial authority and follow the University's [Financial Regulations](#) and procurement rules;
 - Avoid cash payments wherever possible.
 - **Staff should report any requests to make facilitation payments**, even if refused.

Due Diligence Guidance

10. Due diligence should go beyond verifying existence and financial health. Consider the following:
 - **Ownership and control structures** to identify politically exposed persons or hidden beneficial owners. This may include certification or contract clauses requiring compliance with our policies.
 - **Previous regulatory, compliance, or legal issues**, including past bribery, fraud, or AML violations.
 - **Conflicts of interest**, including family, business, or personal connections.
 - **Verification of credentials or licensing**, especially for partners providing regulated services or research.
 - Ensure appropriate **sign off** in accordance with the University's [Financial Regulations](#).
11. Ongoing monitoring should include:
 - Conducting **periodic reviews** of high-risk partners or contracts.
 - Monitoring transactions for **red flags** during the course of the relationship.
 - **Updating risk assessments** if circumstances or the operating environment change (e.g., new jurisdictions, mergers, new funding sources, or other reputational, regulatory or legal risks identified).

Documentation

- Keep **records of all due diligence** checks, approvals, and decisions.
- Document **risk assessment outcomes** and rationale for engaging with higher-risk partners.

Note: Annex 1 and 2 sets out the key risks and warning signs of fraud and bribery.

The University's risk-based due diligence guidance complements Annexes 1 and 2, which outline the key risks and warning signs of fraud and bribery. It reinforces the need for staff to identify, assess, and report any concerns promptly.

Annex 1: Fraud – Key Risks and Warning Signs

Fraud occurs when three factors, known as the ‘*Fraud Triangle*’, converge: **opportunity** (a gap or weakness in controls that can be exploited); **motive** (a personal or financial pressure driving the behaviour); and **rationalisation** (justifying committing the act). Here are some examples of fraud that could occur in a Higher Education setting and warning signs:

Type	Examples of fraud	Red Flags
Employee fraud	<ol style="list-style-type: none"> Financial and Procurement Misconduct – Deliberate actions to gain financial advantage, including payroll fraud, falsified expenses, theft, misreporting, over-ordering, kickbacks, or supplier manipulation. Contract Fraud – Over-ordering, kickbacks, or supplier manipulation beyond tender interference. Abuse of Position / Authority – Misuse of role or influence to secure personal gain or manipulate processes, such as tender interference. Ethical / Compliance Breaches – Violations of professional or regulatory standards, including false references, falsified qualifications, theft or misuse of assets, or undisclosed conflicts of interest, gifts, or hospitality. Collusion – Employees working together to commit fraud Deliberate misrepresentation – financial records manipulated to distort the performance or position 	<p>Behavioural: Secretive or protective of work/contracts; working unusual hours; avoiding leave.</p> <p>Financial: Unexplained transactions, unusual claims, altered records, changes in banking details; disproportionate remuneration; undeclared conflicts of interest.</p> <p>Procedural: Circumventing normal procedures; bypassing controls; inconsistent oversight; restricted transparency, manipulation of documents or omission of information.</p>
Academic fraud	<ol style="list-style-type: none"> Plagiarism, Contract Cheating, and Improper Authorship – copying others’ work without attribution, submitting work done by someone else (including ghost-writing or paid assistance) as one’s own, or engaging in unethical authorship or citation practices such as falsely including/excluding authors or misrepresenting citations. Falsifying Qualifications and Funding Claims – misrepresenting degrees, certificates, or credentials, or falsifying grant/funding applications, outcomes, or use of funds. Research and Academic Misconduct – fabricating, falsifying, or selectively reporting data; unauthorised use of research materials, lab results, software, or proprietary methods; or falsifying attendance, lab logs, fieldwork, or class participation records. Exam and Assessment Fraud – cheating in exams, assessments, or online tests. 	<p>Behavioural: Secretive about submissions; reluctance to share work or methods.</p> <p>Financial: Suspicious or irregular research funding, grant, or expense claims.</p> <p>Procedural: Irregular data handling; multiple identical submissions; improper record-keeping.</p>
Cybercrime / IT-related fraud	<ol style="list-style-type: none"> Unauthorised Access and Hacking – gaining access to systems, networks, or accounts without permission, including insider misuse. Phishing and Social Engineering – manipulating individuals to reveal sensitive information or bypass security controls. Malware, Ransomware, and System Manipulation – introducing malicious software or altering IT systems to commit fraud or disrupt operations. AI-enabled Fraud and Deepfakes – using AI to manipulate data, communications, or documents for fraudulent purposes. Data and Identity Theft – unauthorised copying, sharing, or misuse of institutional or personal data and credentials. 	<p>Behavioural: Unusual IT activity, reluctance to share access, unexpected communications.</p> <p>Financial: Unexplained or unusual payment requests.</p> <p>Procedural: Bypassing security protocols, inconsistent system access, or standard IT procedures.</p>
Student conduct	<ol style="list-style-type: none"> Fraudulent / False Compensation Claims – false claims for hardship funds, course delivery issues, strike-related education losses, or submission of false supporting documentation. Misuse of Resources – unauthorised use or abuse of library or IT resources or University-provided materials. Attendance Fraud – falsifying attendance, participation records, or related logs. Collusion – Students working together to commit fraud. 	<p>Behavioural: Inconsistent or contradictory explanations; reluctance to provide supporting information; repeated requests for assistance.</p> <p>Financial: Sudden or unexplained claims; repeated high-value claims; unusual patterns in fund usage.</p> <p>Procedural: Incomplete or inconsistent documentation; submission of altered or forged documents; bypassing normal claim procedures.</p>

Annex 2: Bribery - Prohibited Conduct, Key Risks and Warning Signs

What is not acceptable?

Under the **Bribery Act 2010** and this Policy, members of staff, students, and anyone acting on behalf of the University must not:

- (a) Offer, give, or promise anything of value to gain or reward an improper advantage.
- (b) Make facilitation payments or offer inducements to public officials or representatives.
- (c) Solicit or accept any payment, gift, or hospitality intended to influence decisions.
- (d) Accept gifts or hospitality that could be seen to create a conflict of interest.
- (e) Threaten, harass, or retaliate against anyone who refuses to engage in bribery or raises a concern.

Activities that carry higher risks of Bribery

Certain University activities carry a **higher risk** of bribery or corruption, including:

- (a) Procurement and tender exercises.
- (b) Contract negotiation, consultancy, and commission arrangements.
- (c) Joint ventures, subsidiaries, and collaborative partnerships.
- (d) Working with agents, intermediaries, or consultants.
- (e) Interactions with public officials, regulators, or accrediting bodies.
- (f) Donations, sponsorships, and research funding.
- (g) Recruitment and promotion processes.
- (h) Admissions, scholarships, bursaries, and student assessment.
- (i) Visa, permit, and license applications.
- (j) Overseas travel, especially to higher-risk jurisdictions.
- (k) Giving or receiving gifts and hospitality.
- (l) Providing references, peer reviews, or endorsements.
- (m) Handling confidential or commercially sensitive data.

Warning Signs of Bribery and Corruption (Red Flags)

Bribery often arises where **opportunity, motive, and rationalisation** intersect (commonly known as the *fraud triangle*). Potential warning signs include, but are not limited to:

Type	Examples of bribery	Red Flags
Bribery / corruption / irregularity	<ol style="list-style-type: none"> 1 Offering or accepting a bribe to: <ul style="list-style-type: none"> • secure or retain a contract. • gain an advantage over a competitor. • obtain a university place, qualification, or grade. • of gifts, hospitality, or other benefits with the intent to influence a decision 2 Bribery in recruitment or promotion decisions. 3 Facilitation payments. 4 Undue influence in contracts, admissions, honours or recruitment. 5 The University failing to prevent a person associated with it from bribing another on its behalf. 6 Conflicts of interest. 7 Kickbacks. 8 Theft or misuse of university assets. 	<p>Behavioural: Secretive or protective of work/contracts; working unusual hours; avoiding leave, reluctance to share information, unusual or close personal relationships between staff and external partners, suppliers, students, or applicants, or avoidance of oversight.</p> <p>Financial: Unexplained or irregular financial records, disproportionate remuneration, unaccounted research grant expenditure, undeclared or excessive gifts or hospitality, or undeclared conflicts of interest.</p> <p>Procedural: Circumventing approval processes, lack of documentation, bypassing normal approval or authorisation routes, lack of competitive process, preference for single suppliers, insistence on dealing with one contact, use of unqualified third parties, resistance to audit / scrutiny, limited due diligence, inadequate segregation of duties, or restricted transparency.</p>