
Ravensbourne University London

Anti-Bribery Policy

Introduction

Ravensbourne (the Institution) recognises its responsibility to prevent bribery in all parts of its business in the UK and overseas and has an unequivocal anti-bribery stance.

The Bribery Act sets out four bribery offences as detailed below -

- Bribing another person
- Being bribed
- Bribery of foreign public officials
- The failure of commercial organisations to prevent persons associated with them from committing bribery on their behalf both within the UK and overseas

Responsibility

The responsibility for preventing bribery lies with all members or staff of the Institution and is not restricted to those with resource or financial responsibilities. This Policy applies to all employees (staff, contract and temporary), Governors, third parties and associated persons, including Agents, contractors, etc acting on behalf of the Institution in the UK and overseas. Staff who breach this Policy may face disciplinary action, which could result in dismissal for gross misconduct.

The Board of Governors is required to satisfy itself that The Bribery Act 2010 is being communicated and incorporated in its procedures in areas of the business where it is deemed a risk of bribery could be committed.

The Senior Management Team has the executive responsibility to put in place adequate procedures to prevent bribery.

The Director of Finance has the responsibility to keep the Board, Finance, Investments and General Purposes Committee (FI&GPC) and the Audit Committee advised of any areas where an act of bribery has been committed.

The FI&GPC will monitor the performance of the Institution in relation to the prevention of bribery and its compliance with this policy via its risk strategy and risk registers.

To help discharge this responsibility, the Institution will review its procedures in relation to its exposure to risk every year and this process will be documented.

All managers have the executive responsibility to maintain an awareness of the exposure to risk in their own area of operation and to ensure the procedures are followed

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Communication

All members of staff must read, understand and comply with this policy and it will form part of the induction process for new members of staff.

Our zero-tolerance approach to bribery will be communicated to third parties doing business with us.

Risk Assessment

The following key areas of potential exposure to risk have been identified -

- a) Hospitality, gifts or donations
- b) Large scale projects
- c) Overseas recruitment in high risk territories
- d) Use of third party agents as intermediaries
- e) Dealing with overseas government officials

Procedures for dealing with high risk areas

It is important that due regard is paid to assessing the risk of possible corruption before any new business relationship is established, but especially in high risk areas. Particular areas to consider in all cases are: geographical location, relevant laws, identity of business partners and the nature of the proposed business/transaction.

Hospitality, gifts or donations

Certain conduct is automatically prohibited. Prohibited conduct includes facilitation payments; kickbacks; political donations and payments to public officials.

Please refer to the policy on this area in the financial regulations. In particular staff must not accept gifts or hospitality from students.

If you receive a gift in any other context you must notify your line manager, in line with the Financial regulations, gifts over £50 in value must be approved in writing by the Director (or the Deputy Director in his/her absence), notified to the Director of Finance or Director of HR, FE and Marketing and be updated in the Gifts Register maintained by Academic Administrative Officers. The Director of Finance will be responsible for reviewing the register on a monthly basis, and FI&GPC will receive a report on such gifts at their regular meetings.

Large scale projects

Please refer to the policy on this area in the financial regulations – E5 Contracts and Tenders.

The Institution's purchasing manual also covers the procedures for procuring on large scale projects.

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Overseas recruitment in high risk territories including use of third party agents and dealing with overseas government officials

Employees and associated persons conducting business on behalf of Ravensbourne outside the UK may be at greater risk of being exposed to bribery or unethical business conduct than UK-based employees. Employees and associated persons owe a duty to Ravensbourne to be extra vigilant when conducting international business.

Procedure

Employees and associated persons are required to report suspicions of bribery and any unlawful bribes to the appropriate member of senior management. While any suspicious circumstances should be reported, employees and associated persons are required particularly to report:

- close family, personal or business ties that a prospective agent, representative or joint-venture partner may have with government or corporate officials, directors or employees;
- requests for cash payments;
- the offer of any bribe (which must be refused);
- requests for unusual payment arrangements, for example via a third party;
- requests for reimbursements of unsubstantiated or unusual expenses; or
- a lack of standard invoices and proper financial practices.

Reporting issues or needing further advice

Any concerns relating to the business practices of any employee, third party or associate (for example if you believe or suspect that a conflict with the Bribery Policy has occurred or may occur in the future) can also be reported by following the procedure set out in our Whistle Blowing Policy. If a member of staff feels they need further guidance on a situation, they should contact the Director of Finance or the Director immediately for further advice. Please refer to the policy on this area in the financial regulations – B4.6 Fraud and corruption. This area of the regulations documents the Fraud Response Plan for the institution.