

Anti-Bribery Policy

1. Purpose

- 1.1 Health Sciences University (“the University”) is fully committed to instilling a strong anti-corruption culture and is fully committed to compliance with all anti-bribery and anti-corruption legislation including, the Bribery Act 2010 (“the Act”) and ensures that no bribes or other corrupt payments, inducements or similar are made, offered, sought or obtained by us or anyone working on our behalf.
- 1.2 This Policy applies to all employees, agents, contractors, subcontractors, consultants, business partners and any other parties (including students) associated with the University or any of its subsidiaries.

2. Bribery

- 2.1 Bribery is defined as the giving or promising of a financial or other advantage to another party where that advantage is intended to induce the other party to perform a particular function improperly, to reward them for the same, or where the acceptance of that advantage is in itself improper conduct.
- 2.2 Bribery is also deemed to take place if any party requests or agrees to receive a financial or other advantage from another party where that advantage is intended to induce that party to perform a particular function improperly, where the acceptance of that advantage is in itself improper conduct, or where that party acts improperly in anticipation of such advantage.

3. Consequences of Bribery

- 3.1 Anyone or any organisation found guilty of bribery under the Act may face fines and/or prison terms. In addition, high legal costs and adverse publicity are likely to result from any breach of the Act.
- 3.2 For employees of the University, failure to comply with this Policy and/or with the Act may result in:
 - 3.2.1 disciplinary action which may include dismissal; and
 - 3.2.2 criminal penalties under the Act which may result in a fine and/or imprisonment for up to 10 years.
- 3.3 For the University, any breach of this Policy may result in:
 - 3.3.1 the University being deemed to be in breach of the Act;
 - 3.3.2 the University being subject to fines; and
 - 3.3.3 the University suffering negative publicity and further associated damage as a result of a breach.

4. Responsibility for Compliance and Scope of Policy

- 4.1 It is the responsibility of all parties associated with the University to ensure that bribery is prevented, detected and reported and all such reports should be made in accordance with the University’s Whistleblowing Policy or as otherwise stated in this Policy, as appropriate.
- 4.2 No party may:
 - 4.2.1 give or promise any financial or other advantage to another party on the University’s behalf where that advantage is intended to induce the other party to perform a particular function improperly, to reward them for the same,
 - 4.2.2 request or agree to receive any financial or other advantage from another party

where that advantage is intended to induce the improper performance of a particular function, where the acceptance of that advantage will in itself constitute improper conduct.

- 4.3 All parties must:
- 4.3.1 be aware and alert at all times of all bribery risks as described in this Policy and in particular as set out in section 9 below;
 - 4.3.2 exercise due diligence at all times when dealing with third parties on behalf of the University; and
 - 4.3.3 report any and all concerns relating to bribery to the Chief Operating Officer or, in the case of non-employees, their normal point of contact within the University, or otherwise in accordance with the University's Whistleblowing Policy.

5. Facilitation Payments

- 5.1 A facilitation payment is defined as a small payment made to officials in order to ensure or speed up the performance of routine or necessary functions.
- 5.2 Facilitation payments constitute bribes and, subject to section 5.3, may not be made at any time irrespective of prevailing business customs in certain territories unless you consider that your life, or the life of any other party, is in danger

6. Gifts and Hospitality

- 6.1 Gifts and hospitality remain a legitimate part of conducting business and should be provided only in compliance with the University's Hospitality and Gifts Policy.
- 6.2 Gifts and hospitality can, when excessive, constitute a bribe and/or a conflict of interest. Care should be exercised at all times when giving or receiving any form of gift or hospitality on behalf of the University.
- 6.3 The following general principles apply:
- 6.3.1 Gifts and hospitality may neither be given nor received as rewards, inducements or encouragement for preferential treatment or inappropriate or dishonest conduct.
 - 6.3.2 Neither gifts nor hospitality should be actively sought or encouraged from any party, nor should the impression be given that the award of any business, custom, contract or similar will be in any way conditional on gifts or hospitality.
 - 6.3.3 Cash should be neither given nor received as a gift under any circumstances.
 - 6.3.4 Gifts and hospitality to or from relevant parties should be generally avoided at the time of contracts being tendered or awarded.
 - 6.3.5 The value of all gifts and hospitality, whether given or received, should be proportionate to the matter to which they relate and should not be unusually high or generous when compared to prevailing practices in our industry or sector.
 - 6.3.6 Certain gifts which would otherwise be in breach of this Policy and/or the Hospitality and Gifts Policy may be accepted if refusal would cause significant and/or cultural offence.
 - 6.3.7 All gifts and hospitality, whether given or received, must be recorded in the Hospitality & Gifts Register.

7. Charitable Donations

- 7.1 Charitable donations are permitted only to registered (non-profit) charities. No charitable donations may be given to any organisation which is not a registered charity.
- 7.2 All charitable donations must be approved by the Executive Leadership Group and fully recorded by the Finance Office.
- 7.3 Proof of receipt of all charitable donations must be obtained from the recipient organisation.

- 7.4 Under no circumstances may charitable donations be made in cash.
- 7.5 No charitable donation may be made at the request of any party where that donation may result in improper conduct.

8. Political Donations

- 8.1 The University does not make political donations, and the University is not affiliated with any political party, independent candidate, or with any other organisation whose activities are primarily political.
- 8.2 Employees and other associated parties are free to make personal donations provided such payments are not purported to be made on behalf of the University and are not made to obtain any form of advantage in any business transaction.

9. Due Diligence and Risks

The following issues should be considered with care in all transactions, dealings with officials, agents, and other business matters concerning third parties:

- 9.1 Territorial risks, particularly the prevalence of bribery and corruption in a particular country;
- 9.2 Cross-border payments, particularly those involving territories falling under section 9.1;
- 9.3 Requests for cash payment, payment through intermediaries or other unusual methods of payment;
- 9.4 Activities requiring the University and / or any associated party to obtain permits or other forms of official authorisation.
- 9.5 Transactions involving the import or export of goods.

Version:	2.0
Approved by:	PRMG and A&RA
Originator / Author:	Head of Finance & Procurement
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Reference source:	
Date approved:	25 November 2025
Effective from:	25 November 2025
Review date:	November 2028
Target:	Health Sciences University Staff
Policy location:	Sharepoint site, HSU website
Equality analysis:	No direct impact, the policy provides for equality analysis to be undertaken as part of policy review. The policy provides for information to be made available in alternative formats as required, to make reasonable adjustments in line with the Equality Act 2010.