

Anti-corruption and Bribery Policy

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	Public
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Category	Regulations
Approved by	Board of Governors

Abstract:

The purpose of this policy is to:

i. set out our responsibilities, and of those working for and on our behalf, in observing and upholding our position on bribery and corruption; and

ii. provide information and guidance to those working for and on our behalf on how to recognise and deal with bribery and corruption issues.

This policy does not form part of any contract of employment or other contract to provide services and we may amend it at any time

Applicability:

This policy applies to all staff (including contractors and volunteers), students and members of the public.

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1. Policy Statement

1.1. Fairfield School of Business ("FSB" or "We") conducts all its business in an honest and ethical manner. We take a zero-tolerance approach to bribery and corruption and are committed to acting professionally, fairly and with integrity in all our business dealings and relationships wherever we operate and implementing and enforcing effective systems to counter bribery and corruption.

1.2. We will uphold all laws relevant to countering bribery and corruption. However, we are still bound by UK laws, including the Bribery Act 2010, in respect of our conduct both at home and abroad.

2. Definitions and behaviours covered in this policy

Corruption

2.1. Corruption is generally understood as the abuse of entrusted power, authority or position for personal, organisational or other improper advantage. There is no single statutory definition of corruption under UK law. Instead, corrupt conduct may be addressed through a range of legislation and legal principles, including the Bribery Act 2010, the Fraud Act 2006 and the Economic Crime and Corporate Transparency Act 2023.

2.2. For the purposes of this policy, corruption includes conduct involving bribery, fraud, conflicts of interest, abuse of position or other dishonest or improper behaviour intended to secure an inappropriate advantage for an individual, the School or another person or organisation.

Bribery

2.3. Bribery is the offering, promising, giving, requesting, agreeing to receive or accepting of a financial or other advantage in circumstances intended to induce, reward or result in the improper performance of a relevant function or activity.

2.4. A bribe does not have to consist of money. It may include gifts, hospitality, entertainment, preferential treatment, discounts, employment opportunities, services, charitable donations or any other financial or non-financial advantage.

2.5. Bribery may take place directly or indirectly, including through a third party acting on behalf of another person or organisation.

Bribery Act 2010

2.6. The Bribery Act 2010 is the principal UK legislation governing bribery. It establishes four key offences:

- Bribing another person – offering, promising or giving a financial or other advantage with the intention of inducing or rewarding the improper performance of a relevant function or activity.
- Being bribed – requesting, agreeing to receive or accepting a financial or other advantage in circumstances involving the improper performance of a relevant function or activity.
- Bribery of a foreign public official – offering, promising or giving a financial or other advantage to a foreign public official with the intention of influencing that official in their official capacity in order to obtain or retain business or an advantage in the conduct of business, where the advantage is not otherwise permitted by applicable law.
- Failure of a commercial organisation to prevent bribery – a relevant commercial organisation may commit an offence where a person associated with it bribes another person intending to obtain or retain business or a business advantage for the organisation. It is a defence for the organisation to demonstrate that it had adequate procedures in place designed to prevent such conduct.

Fraud

2.7. In the UK, **fraud** is legally defined as an act of dishonesty with the intention of making a personal gain or causing a loss to another party. The Fraud Act 2006 outlines three main classes of fraud: fraud by false representation, fraud by failing to disclose information, and fraud by abuse of position. This act provides a statutory framework for prosecuting fraud-related offences.

Facilitation payments

2.8. Facilitation payments, also known as "back-handers" or "grease payments", are typically small, unofficial payments made to secure or expedite a routine or necessary action (for example by a government official). They are not common in the UK but are common in some other areas.

Kickbacks

2.9. 'Kickbacks' are typically payments made in return for a business favour or advantage.

Third Party

'Third party' means any individual or organisation you meet during your time working for us, and includes actual and potential clients, customers, suppliers, distributors, business contacts, agents, advisers, and government and public bodies, including their advisors, representatives and officials, politicians and political parties.

3. About this policy

3.1. This policy sets out the FSB's commitment to preventing bribery, corruption and other forms of improper conduct. It provides a framework for identifying, preventing and reporting concerns and supports us in complying with relevant UK legislation, including the Bribery Act 2010 and other applicable economic crime legislation.

4. Who does this policy apply to?

4.1. This policy applies to all individuals working for FSB or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives and business partners, sponsors, or any other person associated with us, wherever found.

5. Who is responsible for the policy?

5.1. The Board of Governors ("the Board") has overall responsibility for the effective operation of this policy but has delegated responsibility for overseeing its implementation to the CEO. Suggestions for change should be reported to the CEO.

5.2. The Principal and the Legal Counsel have day-to-day responsibility for this policy, and you should refer any questions about this policy to them in the first instance. They will involve the CEO where appropriate.

5.3. Managers at all levels are responsible for ensuring that individuals reporting to them understand and comply with this policy and receive appropriate guidance and support.

5.4. All individuals working for or on behalf of FSB are responsible for:

- reading, understanding, and complying with this policy
- avoiding any activity that may lead to bribery or corruption
- reporting concerns promptly in accordance with this policy

5.5. This policy is reviewed continually by the CEO.

6. Identifying risks of bribery and corruption

6.1. We have identified that the following are particular risks for our business although this is a non-exhaustive list. If you are not sure about whether a particular act amounts to bribery or corruption, you should consult the Principal or the Legal Counsel.

a. Attempts to influence academic judgment and admissions decisions
b. Introduction payments for referrals by third parties including students
c. Attempts to subvert or influence disciplinary proceedings

6.2. To address these risks, we ensure that the relevant staff are appropriately trained and are aware on how to report bribery and corruption.

7. Economic Crime and Corporate Transparency Act 2023

7.1. The Economic Crime and Corporate Transparency Act 2023 introduced a corporate offence of failure to prevent fraud, which came into force on 1 September 2025. The legislation is intended to strengthen organisational accountability and encourage organisations to implement effective measures to prevent fraudulent activity.

7.2. Under the Act, a large organisation may be held criminally liable where an employee, agent, subsidiary or other associated person commits a specified fraud offence intending to benefit the organisation or, in certain circumstances, a person to whom the organisation provides services, unless the organisation can demonstrate that it had reasonable fraud prevention procedures in place or that it was reasonable not to have such procedures.

7.3. The statutory failure to prevent fraud offence applies to organisations meeting the relevant size criteria. However, FSB recognises that the principles of effective fraud prevention represent good organisational practice regardless of whether the statutory thresholds apply.

7.4. FSB is therefore committed to maintaining proportionate measures to prevent and detect fraud, bribery and corruption. These include appropriate risk assessment, financial and operational controls, due diligence, staff awareness and training, clear reporting procedures, and the ongoing monitoring and review of fraud and corruption risks.

7.5. All staff and individuals acting on behalf of FSB are expected to act honestly and with integrity and must promptly report any suspected fraud, bribery, corruption or other financial misconduct in accordance with our reporting and whistleblowing procedures.

8. What you must not do

8.1. It is not acceptable for you (or someone on your behalf) to:

i. give, promise to give, or offer, a payment, gift or hospitality with the expectation or hope that a business advantage will be received, or to reward a business advantage already given,

ii. give or accept a gift or hospitality during any commercial negotiations or tender process, if this could be perceived as intended or likely to influence the outcome,

iii. accept a payment, gift or hospitality from a third party that you know, or suspect is offered with the expectation that it will provide a business advantage for them or anyone else in return,

iv. offer or accept a gift to or from government officials or representatives, or politicians or political parties,

v. threaten or retaliate against another individual who has refused to commit a bribery offence or who has raised concerns under this policy, or

vi. engage in any other activity that might lead to a breach of this policy.

9. Facilitation payments and kickbacks

9.1. We do not make, and will not accept, facilitation payments or "kickbacks" of any kind. See Clause 6 for definitions of these terms.

9.2. You must avoid any activity that might lead to a facilitation payment or kickback being made or accepted by us or on our behalf, or that might suggest that such a payment will be made or accepted. If you are asked to make a payment on our behalf, you should always be mindful of what the payment is for and whether the amount requested is proportionate to the goods or services provided. You should always ask for a receipt which details the reason for the payment. If you have any suspicions, concerns or queries regarding a payment, you should raise these with the Compliance Manager.

10. Conflicts of Interest

10.1. FSB recognises that unmanaged conflicts of interest may increase the risk of bribery, corruption, or improper decision-making.

10.2. All staff, governors, contractors, and individuals acting on behalf of FSB must declare any actual, potential, or perceived conflicts of interest that may influence, or appear to influence, their professional judgement or decision-making.

10.3. Conflicts of interest must be declared in accordance with the FSB Conflict of Interest Policy and recorded appropriately. Individuals must not participate in decisions where a conflict of interest may compromise impartiality.

10.4. Failure to declare a relevant conflict of interest may be treated as a disciplinary matter.

11. Gifts, hospitality and expenses

11.1. This policy allows reasonable and appropriate hospitality or entertainment given to or received from third parties, for the purposes of:

- establishing or supporting good business relationships;
- improving or maintaining our image or reputation; or
- marketing or presenting our products and/ or services effectively.

11.2. The giving and accepting of gifts are allowed if the following requirements are met:

i. it is not made with the intention of influencing a third party to obtain or retain business or a business advantage, or to reward the provision or retention of business or a business advantage, or in explicit or implicit exchange for favours or benefits;

ii. it is given in our name, not in your name;

iii. it does not include cash or a cash equivalent (such as gift certificates or vouchers);

iv. it is appropriate in the circumstances, taking account of the reason for the gift, its timing and value. For example, in the UK it is customary for small gifts to be given at Christmas;

v. it is given openly, not secretly; and

vi. it complies with any applicable local law.

11.3. Promotional gifts of low value such as branded stationery to or from existing customers, suppliers and business partners will usually be acceptable.

11.4. Reimbursing a third party's expenses or accepting an offer to reimburse our expenses (for example, the costs of attending a business meeting) would not usually amount to bribery. However, a payment more than genuine and reasonable business expenses (such as the cost of an extended hotel stay) is not acceptable.

11.5. We appreciate that practice varies between countries and regions and what may be normal and acceptable in one region may not be in another. The test to be applied is whether in all the circumstances the gift, hospitality or payment is reasonable and justifiable. The intention behind it should always be considered.

12. Due Diligence and Third Parties

12.1. FSB is committed to undertaking proportionate due diligence on third parties who act on its behalf or who provide services to the organisation.

12.2. Appropriate checks may be carried out before entering into relationships with agents, contractors, consultants, suppliers, recruitment partners, or other third parties. These checks may include:

- verification of identity and legitimacy;
- review of reputation and previous conduct
- assessment of potential bribery or corruption risks
- confirmation that the third party is willing to comply with applicable anti-bribery and corruption requirements.

12.3. Written agreements should include appropriate contractual obligations relating to compliance with anti-bribery and corruption laws and standards where relevant.

13. Donations

13.1. We do not make contributions to political parties.

13.2. We will ensure that any charitable donations we may make are legal and ethical under local laws and practices. No donation must be offered or made without the prior approval of the CEO.

14. Record-keeping

14.1. We must keep financial records and have appropriate internal controls in place which will evidence the business reason for making payments to third parties.

14.2. You must declare and keep a written record of all hospitality or gifts given or received, which will be subject to managerial review.

14.3. You must submit all expenses claims relating to hospitality, gifts or payments to third parties in accordance with our expenses policy and record the reason for expenditure.

14.4. All accounts, invoices, and other records relating to dealings with third parties including suppliers and customers should be prepared with strict accuracy and completeness. Accounts must not be kept "off-book" to facilitate or conceal improper payments.

15. Your responsibilities

15.1. You must ensure that you read, understand and comply with this policy.

15.2. The prevention, detection and reporting of bribery and other forms of corruption are the responsibility of all those working for us or under our control. You must avoid any activity that might lead to, or suggest, a breach of this policy.

15.3. You must notify your line manager, the Principal, the Legal Counsel or the CEO as soon as possible if you believe or suspect that a conflict with this policy has occurred or may occur in the future. For example, if a client or potential client offers you something to gain a business advantage with us or indicates to you that a gift or payment is required to secure their business. Further "red flags" that may indicate bribery or corruption are set out in clause 20.

16. How to raise a concern

16.1. You are encouraged to raise concerns about any issue or suspicion of bribery or corruption at the earliest possible stage.

16.2. If you are offered a bribe, or are asked to make one, or if you believe or suspect that any bribery, corruption or other breach of this policy has occurred or may occur, you must notify your line manager, the Principal, the Legal Counsel or the CEO or report it in accordance with our Whistleblowing Policy as soon as possible.

16.3. If you are unsure about whether a particular act constitutes bribery or corruption, raise it with your line manager, the Principal, the Legal Counsel or the CEO.

Investigation of Concerns

16.4. Any concerns raised under this policy will be taken seriously and considered promptly, fairly, and confidentially, so far as reasonably possible.

16.5. FSB may carry out an internal investigation where appropriate and may involve external agencies, advisers, or authorities where necessary.

16.6. Individuals are expected to cooperate fully with any investigation relating to suspected bribery or corruption.

17. Protection

17.1. Individuals who refuse to accept or offer a bribe, or who raise concerns or report another's wrongdoing, are sometimes worried about possible repercussions. We aim to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken.

17.2. We are committed to ensuring no one suffers any detrimental treatment as a result of refusing to take part in bribery or corruption, or because of reporting in good faith their suspicion that an actual or potential bribery or other corruption offence has taken place or may take place in the future. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If you believe that you have suffered any such treatment, you should inform your line manager, the Principal, the Legal Counsel or the CEO immediately. If the matter is not remedied, and you are an employee, you should raise it formally using our Grievance Procedure, which is available in the Staff Handbook.

18. Training and communication

18.1. Training on this policy forms part of the induction process for all individuals who work for us, and regular training will be provided, as necessary.

18.2. Our zero-tolerance approach to bribery and corruption must be communicated to all suppliers, contractors and business partners at the outset of our business relationship with them and as appropriately thereafter.

19. Breaches of this policy

19.1. Any employee who breaches this policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct.

19.2. We may end our relationship with other individuals and organisations working on our behalf if they breach this policy.

20. Potential risk scenarios: "red flags"

20.1. The following is a list of possible red flags that may arise during the course of you working for us and which may raise concerns under various anti-bribery and anti-corruption laws. The list is not intended to be exhaustive and is for illustrative purposes only. If you encounter any of these red flags while working for us, you must report them promptly to your manager, the Principal, the Legal Counsel or the CEO or using the procedure set out in the Whistleblowing Policy:

i. you become aware that a third party engages in, or has been accused of engaging in, improper business practices;

ii. you learn that a third party has a reputation for paying bribes, or requiring that bribes are paid to them;

iii. a third party insists on receiving a commission or fee payment before committing to sign up to a contract with us, or carrying out a government function or process for us;

iv. a third-party requests payment in cash and/or refuses to sign a formal commission or fee agreement, or to supply an invoice or receipt for a payment made;

v. a third-party request that payment is made to a country or geographic location different from where the third party resides or conducts business;

vi. a third party requests an unexpected added fee or commission to "facilitate" a service;

vii. a third party demands lavish entertainment or gifts before commencing or continuing contractual negotiations or provision of services;

viii. a third-party request that a payment is made to "overlook" potential legal violations;

ix. a third-party request that you provide employment or some other advantage to a friend or relative;

x. you receive an invoice from a third party that appears to be non-standard or customised;

xi. a third party insists on the use of side letters or refuses to put terms agreed in writing;

xii. you notice that we have been invoiced for a commission or fee payment that appears large given the service stated to have been provided;

xiii. a third party requests or requires the use of an agent, intermediary, consultant, distributor or supplier that is not typically used by or known to us;

xiv. you are offered an unusually generous gift or offered lavish hospitality by a third party.

Document governance

Document owner*	**CEO**
Consulted parties**	General legal counsel; Governing Body
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**Responsible for updates to this content.*
*** To be consulted on updates to this content.*

Versions

Version no.	Description of Changes	Approved by	Date
1.0 - 2.1	Original version and subsequent annual edits	Board of Governors	Sep 2017 Sep 2018 Sep 2019 Oct 2020
3.0	All sections revised, document streamlined and reformatted.	Board of Governors	Jan 2022
3.1	Periodic review and update; No major changes to content.	Board of Governors	Sep 2022
3.2	No major changes, policy carried over until independent review of corporate governance documents due in September 2024	Board of Governors (C.A)	Jan 2024
3.3	New formatting applied.	Board of Governors	Oct 2025
3.4	All sections revised. Updated to clarify bribery offences under the Bribery Act 2010, policy ownership, compliance requirements and staff responsibilities for declaring and managing conflicts of interest.	Board of Governors (C.A)	Oct 2026


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