

POLICY AGAINST BRIBERY, CORRUPTION AND FRAUD

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A. Background and purpose

1. The University is committed to ensuring that high standards of integrity apply in all of its areas of operation and that all of its business is conducted in an honest and transparent manner. As an educational establishment and a charity deriving a significant proportion of its income from public funds, benefactions and charitable organisations, the University is concerned to protect itself and its funders, donors, employees and students from the detriment associated with Bribery, other corrupt activity and Fraud. It is therefore committed to preventing Bribery and Fraud by Staff and any third party performing services for or on behalf of the University.
2. The University recognises that the risk of Bribery and Fraud will arise in various contexts and will seek to advise, inform and/or train its employees appropriately to assess the risk of Bribery and Fraud being practised and implement practices which reduce the risk of it occurring or being undetected where existing processes are not already in place.
3. The Registry shall oversee the implementation of this policy, provide advice as necessary, and monitor and report to the Audit Committee on breaches of policy, and the general application of the Policy.
4. The purpose of this Policy is to assist those working for or on behalf of the University by:
 - 4.1. setting out their responsibilities in observing and upholding the University's position on Bribery and Fraud; and
 - 4.2. providing information and guidance on how to recognise and deal with Bribery and Fraud issues.
5. Bribery and Fraud are punishable for individuals by up to ten years' imprisonment. If the University is found to have taken part in corruption it could face an unlimited fine, be excluded from tendering for public contracts or research funding and face damage to its reputation. The University therefore takes its legal responsibilities very seriously.
6. This Policy has been approved by the University Council.

B. Policy Statement

7. The University will take appropriate action to prevent Bribery and all forms of Fraud in the University.
8. No member of Staff or Associated Person shall seek a financial or other advantage for the University through Bribery.
9. No member of Staff or Associated Person shall offer, promise, give, request, agree to receive or accept a bribe for any purpose.
10. The University prohibits any form of Fraud within its operations, and no University Staff or Associated Persons may engage in any form of Fraud with regard to activity carried out within or on behalf of the University.

11. University Staff who suspect that Bribery or Fraud has occurred are required to report such instances to the Registry and the Director of Finance in accordance with Annex 1. The matter will be appropriately investigated, recorded, and reported in accordance with the Financial Regulations and/or the Whistle-blowing procedures. Notwithstanding the provisions of Regulation 20 of the Financial Regulations, the Registry shall be responsible under this Policy for monitoring and recording instances of Bribery or Fraud and reporting to the Audit Committee in accordance with Section E.
12. The University undertakes risk assessments to assess the nature and extent of its exposure to potential risk of Bribery and Fraud on behalf of its employees, agents and other associated persons, and to identify any new risks. As fraud risks may increase during emergencies, the assessment for fraud risk encompasses a risk assessment for relevant potential emergency scenarios. Emergencies refer to events that pose a risk of widespread loss of life or damage to property, or significant financial instability, and that require ameliorating action by the authorities. Risk assessments are subject to review at least once every two years, or earlier if required.
13. The University monitors and reviews its Bribery and Fraud detection and prevention procedures in accordance with the roles and responsibilities as set out in Section E of this Policy.
14. Bribery and Fraud by Staff will be treated as a serious disciplinary offence resulting, potentially, in dismissal and legal action.
15. Annex 2 contains more detailed guidance in relation to the Financial Regulations and areas of activity where it is considered that the risk of **Bribery** and **Fraud** is particularly high, namely:
 - 15.1. Donations;
 - 15.2. Hospitality and Entertainment;
 - 15.3. Facilitation payments.

C. Scope/Application of the Policy

16. This policy applies to all Staff and Associated Persons.
17. This policy does not apply to:
 - 17.1. Cambridge University Press and Assessment, which has its own complementary policies and procedures; or
 - 17.2. the Colleges.

D. Definitions

18. The University uses the following definitions in this policy:
 - 18.1. **Associated Person/s** refers to any individual or organisation performing services for and on behalf of the University, which may include the University's subsidiaries, recipients of grants, partners in collaborative working arrangements and joint ventures, suppliers, distributors, business contacts, agents, advisers, and government and public bodies;
 - 18.2. **Bribery** refers to:
 - a) offering, promising, giving, requesting, or accepting a financial or other advantage in circumstances occurring inside or outside the UK which are intended to induce or reward Improper performance of a function or activity that
 - i. is of a public nature, performed in the course of a person's employment, connected with a business or trade, or performed on behalf of a body of people; and
 - ii. a reasonable person in the UK would expect to be performed in good faith, impartially or in accordance with a position of trust;

- b) offering, promising or giving a financial or other advantage to a Public Official outside the UK (or somebody else nominated by that official) intending to influence the official in the performance of their official functions in order to obtain or retain business or a business advantage;

18.3. **Fraud** refers to an act or omission, made with the intent of making a financial gain, or causing a financial loss, or exposing another to the risk of a financial loss, in which a person:

- a) dishonestly makes a false representation; or
- b) dishonestly fails to disclose information which he or she is under a legal duty to disclose; or
- c) occupies a position in which he or she is expected to safeguard, or not act against, the interests of another person and dishonestly abuses that position; or
- d) intends, by means of that abuse of that position to make a gain for himself or herself or another, or to cause loss to another or to expose another to the risk of loss.

18.4. **Improper** means where the person concerned:

- a) fails to perform a function or activity in good faith, impartially or in accordance with a position of trust; or
- b) does not perform the function at all.

In deciding whether a function or activity has been performed **Improperly** outside the UK, any local custom or practice must be disregarded unless it is permitted or required by the written law of the country in which it is performed;

18.5. **Public Official** refers to someone who holds a legislative, administrative or judicial position of any kind, whether appointed or elected; someone who exercises a "public function" for any country or territory (or any subdivision of such a country or territory); or an official of or agent of a public international organisation (eg UN; EU);

18.6. **Staff** refers to all individuals working within the University at all levels and grades, 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 institution.

E. Key Roles and Responsibilities

Registry

19. The Registry is responsible for ensuring that this Policy is maintained and that appropriate explanatory guidance is provided and for monitoring compliance with the Policy.

20. The Registry shall have the following specific responsibilities:

- 20.1. to maintain a register of the incidents of Bribery and Fraud that are reported to him or her in accordance with this Policy;
- 20.2. to compile an annual report for the Audit Committee on the implementation of this Policy including the outcomes of any relevant risk assessments and due diligence and any incidents of reported Bribery and Fraud, thereby contributing to the monitoring and review of this Policy; and to recommend any changes to this Policy which, may from time to time, become appropriate;
- 20.3. to ensure that any standard University documents and procedures (including procurement terms and procedures, fundraising documentation, and terms and conditions of employment) reflect the requirements of this Policy;

- 20.4. to coordinate the University's response to any investigation or charge under anti-Bribery or Fraud legislation;
- 20.5. to ensure that procedures are in place to communicate the Policy to all Staff and any relevant Associated Persons and to deliver appropriate training to Staff;
- 20.6. to oversee the compilation of specific Bribery and Fraud risk assessments and the conduct of appropriate due diligence into significant areas of activity with a view to assessing Bribery and Fraud risks and taking appropriate action to mitigate them.

The Registry may delegate these responsibilities to named individuals as he or she sees fit.

Heads of Institutions

- 21. Heads of Institutions are responsible for ensuring Staff complete online anti-bribery, corruption and fraud training. Staff should re-take the training every two years. New staff should complete the training in their first few months. Third parties must confirm in their contracts with the University that they have undertaken their own, equivalent, training.
- 22. The Audit Committee recommends that Heads of Institutions make the training course mandatory for staff designated at higher risk of exposure to bribery and fraud, namely staff who:
 - 22.1. hold any kind of management role (e.g. all principal investigators) and/or have the authority to incur any level of expenditure;
 - 22.2. have international dealings of any kind, but particularly in emerging markets or areas of the world where risk of corruption is higher;
 - 22.3. work with contractors;
 - 22.4. contract on behalf of CUTS;
 - 22.5. are involved at any level in a decision to contract, i.e. to offer or receive goods, services, donations or research grants or contracts;
 - 22.6. are involved in procurement at any level.

Staff and Associated Persons

- 23. Staff and Associated Persons are encouraged to conduct due diligence where they consider that there is a risk that Bribery and/or Fraud might occur in relation to a particular transaction, third party or territory.
- 24. This Policy shall be available to every member of Staff. The University encourages all Staff to complete training on anti-bribery, corruption and fraud, and specifically requires that the training is completed by all members of Staff who are deemed to be most likely to encounter Bribery and Fraud. The University's prohibition of Bribery and Fraud shall be communicated to all suppliers, contractors and business partners at the outset of any business relationship with them and as appropriate thereafter.

Audit Committee

- 25. The nature and extent of the risks relating to Bribery and Fraud to which the University is exposed shall be assessed by the Audit Committee at least once every two years and appropriate changes to this or other policies shall be implemented to reflect the outcomes of such risk assessments. The Audit Committee will receive an annual report on compliance with the Policy through the University's assurance framework.

Council

- 26. The Council is responsible for ensuring that the University has appropriate arrangements in place to prevent Bribery, Corruption and Fraud.

27. The Council shall review this Policy at least every three years and earlier subject to any changes in the Bribery Act 2010 legislation, the Economic Crime and Corporate Transparency Act 2023 and respective guidance.

F. Related documents and Further Guidance

28. Further guidance on the University's Anti Bribery and Corruption Policy, including the associated online training, can be found on the Finance Division's webpages.
<https://www.finance.admin.cam.ac.uk/Compliance/anti-bribery-and-corruption-training>.
29. The University already has guidance, policies and procedures which include provisions to combat Fraudulent or corrupt practices and these remain in full force and effect. This Policy should therefore be read together with:
- 29.1. [University Financial Regulations](#)
 - 29.2. [University Financial Procedures Manual](#)
 - 29.3. ['Whistleblowing' Policy](#)
 - 29.4. [Statement on Corporate Governance](#)
 - 29.5. [Human Resources Staff Guide](#)
 - 29.6. [Human Resources Policies and Procedures](#)
 - 29.7. [Undergraduate Admissions guidance](#)
 - 29.8. [Guidelines on Good Research Practice](#)
 - 29.9. [Misconduct in Research](#)
 - 29.10. Establishing and working with embedded companies: see <https://www.research-operations.admin.cam.ac.uk/>
 - 29.11. Ethical Guidelines for the Acceptance of Benefactions within the University: see [University Statutes and Ordinances](#), Chapter XIII Finance and Property, Notices by the Council.
30. Please contact GCDEnquiries@admin.cam.ac.uk for further information.

Effective date of this Policy¹: [1 July 2025]
Date of next review: [June 2027]

¹ This is an updated version of the original policy that has been in place since 2012.

Annex 1 – Reporting

Any report of suspected **Bribery** or **Fraud** in breach of this Policy shall be made to the Registry and the Director of Finance and thereafter shall be treated as a report made by a Head of Department or an individual pursuant to Regulation 20 of the University Financial Regulations.

<http://www.admin.cam.ac.uk/offices/finance/regulations/finregs/Fraud.html>

Annex 2 – Specific guidance

The University has policies and procedures which include provisions to combat fraudulent or corrupt practices with which employees are expected to comply with for all aspects of University business. There are also specific areas where it is considered advisable to provide more specific guidance.

a) **The [Financial Regulations](#)**

The Financial Regulations not only govern in detail the required financial practice within the University, but establish ethical considerations for the conduct of all University business and clarify individual responsibility. In addition, the [Financial Procedures Manual](#) provides greater detail on day to day administration of University finances and clarity in certain areas such as business and Staff entertainment, research funding and income and procurement of goods and services.

b) **Donations**

The University does not make political donations, and only makes and receives charitable donations in accordance with the Financial Regulations of the University. Any charitable donations received by the University must be requested and received for exclusively charitable purposes and shall not **improperly** influence any decisions made by or on behalf of the University. Acceptance of donations must be made in accordance with the Ethical Guidelines for the Acceptance of Benefactions within the University. See [University Statutes and Ordinances](#), Chapter XIII Finance and Property, Notices by the Council.

c) **Hospitality and entertainment**

Excessive or lavish gifts or hospitality in relation to business transactions or arrangements with donors might constitute **Bribery**.

Acceptance of gifts or hospitality

No University employee or **Associated Person** may receive gifts or hospitality in connection with University business otherwise than in accordance with and subject to the limits contained in [Regulation 2 of the Financial Regulations](#).

No gift or hospitality should be accepted from a third party where there is or could be any expectation that it will lead to a business advantage for them whether or not provided directly by the University.

Provision of gifts and hospitality

Where a gift or hospitality is being provided by or on behalf of the University

- It must not exceed normal business courtesy.
- It must not be 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;
- It must comply with local law(s);
- It should be given in the name of the University and not in an individual's name;
- It should be appropriate in the circumstances, of an appropriate type and value and given at an appropriate time;
- It should be given openly, not secretly;
- Gifts should not be offered to, or accepted from, government officials or representatives, or politicians or political parties, without the prior approval of the Registry.

d) **Facilitation Payments and Kickbacks**

The University will not make any unlawful facilitation payments. Facilitation payments are payments intended to secure or expedite routine or necessary Government action by a **Public Official**. A facilitation payment includes a payment to a Public Official to do their job properly as well as payment to do their job improperly.