



Planning, Governance and Compliance

Anti-Bribery Policy – Related Practical Guidance

1. APPEARANCES AND PERCEPTIONS

A consistently useful test to determine whether or not a behaviour or action gives the appearance or perception of inappropriate influence or conflict of interest is to ask

- 2.3.2 This is an example of an offence of bribing a foreign public official. The offence differs from the other offences above because there is no requirement to prove the foreign public official performed their functions improperly (although in this example they may have done). The offence only requires an offer of a financial or other advantage with the intention of influencing the official, in order to obtain or retain business or a business advantage. The possible advantage in this example is the ability of the University to use its marketing materials promptly.

3.

4. **FACILITATION PAYMENTS**

- 4.1 If you are unsure as to the validity of an official's request for a payment, the steps below should be followed as far as they are applicable and as far as it is possible for you to do so without putting your personal safety or security at risk:

If possible, contact your line manager or supervisor immediately.

Ask the official for proof of the validity of the fee.

Request that a receipt be provided confirming the validity of the payment.

If no proof of validity will be provided, politely decline to make the payment and explain you cannot make the payment because of company policy and anti-bribery laws.

If possible, ask to see the official's supervisor.

Make a full note of the request, the circumstances and the parties involved.

At all times, remain calm, respectful and polite.

- 4.2 If you find you are in fear for your safety or at risk of loss of liberty, do not refuse the payment.

- 4.3 In all circumstances report any demand for facilitation payments immediately in accordance with the University's Raising Concerns process.