



The
University
Of
Sheffield.



CITY College
An International
Faculty Of
The University.

Anti-Bribery Policy and Procedure

1. Introduction

The International Faculty and the University of Sheffield is committed to applying the highest standards of conduct and integrity in its business activities in the UK and overseas and as such does not tolerate bribery.

2. Definition of Bribery

A bribe is a financial advantage or other reward that is offered to, given to, or received by an individual or company to induce or influence that individual or company to perform public or corporate functions or duties improperly.

It applies to employees, officers, agents, consultants, workers, and any other persons or companies acting for or on behalf of the International Faculty or the University.

3. Key Principles

1. Employees and others (officers, agents, consultants, or any other persons or companies) acting for or on behalf of the University shall not make, solicit or receive any bribes or unauthorised payments.
2. The success of the University's anti-bribery approach depends on all employees and those acting for the University playing their part in helping to detect and eradicate any potential for bribery.

4. Offences and High Risk areas

There are four offences covered:

1. active bribery (offering, promising, or giving a bribe)
2. passive bribery (requesting, agreeing to receive, or accepting a bribe)
3. bribery of a foreign public official
4. corporate offence of failure of commercial organisation to prevent bribery

The high risk areas for the International Faculty and the University have identified as: large scale projects, tenders or longer term/high value contracts, gifts, hospitality and entertainment activities, donations, joint or collaborative ventures (including research programmes) and

student recruitment in higher risk countries, significant use of third parties and agencies as intermediaries, dealings and negotiations with government officials or representatives of overseas partners including licence applications, concessions, planning consent, visas, tax and provision of utilities.

5. Process

To report suspected Bribery offences you can follow the Whistle Blowing guidance

6. Approval

Approved by the CITY College Administration Board: 17th of January 2017.