



# Additional Information

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Experimental Medicine

Factsheet 20

## *University Policy on Bribery and Fraud*

The University's Bribery and Fraud Policy can be found in full at  
[www.admin.ox.ac.uk/councilsec/compliance/briberyfraud/](http://www.admin.ox.ac.uk/councilsec/compliance/briberyfraud/)

It is summarised as follows:

### **Policy:**

The University has no tolerance of bribery and fraud and will take appropriate action to prevent it in respect of its activities.

Bribery and Fraud by University employees or student members acting on behalf of the University will be treated as a serious disciplinary offence.

### **Standards:**

Staff and other associated persons who act on behalf of the University are expected to abide by the following standards:

- no financial or other advantage shall be sought through bribery;
- in respect of any activity carried out on behalf of the University, no form of fraud shall be engaged in;
- the payment or acceptance of facilitation payments will not be tolerated;
- University Gifts and Hospitality Policy must be adhered to at all times;
- any suspicion of bribery or fraud should be reported immediately through the defined channels.

### **Application:**

This Policy and associated guidance applies throughout the University, apart from Oxford University Press, which has its own complementary policy and procedures, and includes majority and wholly owned University subsidiary companies except where alternative policies have been approved.

This Policy and associated guidance applies to all staff and associated persons acting on behalf of the University in any manner – further guidance on terms used, the scope and application of the Policy is provided here.

### **Risk assessment:**

Bribery and fraud risk should be regularly assessed by Divisions, Departments and Committees.

### **Third parties:**

Third parties acting for or providing services to the University are expected not to commit bribery or fraud and are advised to familiarize themselves with the provisions of this Policy.

### **Exceptions:**

The only exception to these rules is where there is an immediate threat to life, limb or liberty – such incidents must be reported through the channels defined in this Policy.



### The importance of anti-bribery measures

Bribery and fraud are criminal offences under UK law and under the criminal codes of many other countries. They are activities that divert money and resources towards the personal gain of a few, often to the cost and detriment of the many. Globally they hinder growth of the legitimate economy, often in regions where poverty is high, and act as a barrier to efficient and effective governance; their presence can also aggravate insecurity and potential conflict. Within the context of the University's undertakings, its use of public funds, and objectives for the advancement of learning for the wider benefit, such unethical activities clearly cannot be sanctioned or supported. The incidence of bribery or fraud could have wide-reaching and practical implications that directly affect the primary work of departments and research groups.

These include:

- withdrawal of funding from research councils and other bodies who have a zero tolerance approach to this issue;
- HEFCE sanctions or restrictions on the revenue made available to the University for its activities;
- increased audit scrutiny (from both internal and external bodies) and the imposition of additional controls and constraints to the activity of the University.

### General advice and queries

Staff and students are encouraged to raise initial queries or requests for guidance on matters relating to bribery and fraud with departmental administrators in the first instance.

If you have a query about bribery that cannot be dealt with by your departmental administrator, then contact the Council Secretariat Compliance Team by telephone or e-mail at:

- Telephone: (01865) (2)70187

- [compliance@admin.ox.ac.uk](mailto:compliance@admin.ox.ac.uk)

Any reasonable concerns or suspicions about the occurrence of bribery or fraud should be reported in accordance with the procedures set out below.

### Reporting bribery and fraud

There are Procedures for dealing with actual or suspected breach of the University Bribery & Fraud Policy.

These provide for the reporting and investigation of suspected cases and should be used for any instance where bribery or fraud is reasonably suspected in relation to the activities of the University.

This includes:

*if you are asked to pay a bribe or facilitation payment;*

*if you are forced under duress to pay a bribe;*

*if you are offered a bribe for any reason;*

*if you are asked to undertake any fraudulent activity;*

*if you suspect bribery or fraud is occurring*

***For more information contact***

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