

ANTI-BRIBERY AND FRAUD POLICY

1. Preamble

- 1.1 The University is committed to conducting its activities fairly, honestly and openly, in accordance with relevant legislation, and to the highest standards of integrity. The University has no tolerance of bribery or fraud; this includes active bribery (the offering, promising or giving of a bribe) and passive bribery (the requesting, agreeing to receive or accepting of a bribe).
- 1.2 As a charity, the University is concerned to protect its operations and reputation and its staff, students and other stakeholders from the detriment associated with bribery, fraud and other corrupt activity. It is therefore committed to preventing bribery and/or fraud by its staff and any third party acting for or on behalf of the University.
- 1.3 The University will take appropriate action to prevent bribery in respect of its activities. Where bribery and/or fraud is shown to have occurred, the University will take firm action, which may include dismissal and legal action. Bribery and/or by University employees or student members acting on behalf of the University will be treated as a serious disciplinary offence.
- 1.4 This Policy also takes account of the University's related legislative obligations and provisions pertaining to bribery and associated behaviour as set out in but not limited to:
 - The Bribery Act, 2010;
 - The Fraud Act, 2006;
 - The Terrorism Act, 2006; and
 - The Proceeds of Crime Act, 2002.

2. Scope

- 2.1 This Policy applies to all staff and associated persons of the University. It applies throughout the University and wholly and majority-owned subsidiaries, with the expectation that affiliated companies and partially-owned subsidiaries will maintain complementary policies.
- 2.2 For the purposes of this Policy, *associated persons* means 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.

3. Definitions

- 3.1 Bribery is the offering, promising, giving, requesting, or accepting of a financial or other advantage with the intention to induce or reward improper performance.
- 3.2 Fraud is a dishonest act or omission that is made with the intent of making a gain or causing a loss (or the risk of a loss). It includes:
 - fraud by false representation;
 - fraud by failing to disclose information; and
 - fraud by abuse of position.
- 3.3 Corruption is dishonest or fraudulent conduct, often involving bribery.

4. Standards of Conduct

- 4.1 Staff and others who act on behalf of or provide services to the University are expected to act at all times in a manner that is fair, impartial, and without favouritism or bias. In order to conduct the activities of the University to the highest standards of integrity, in accordance with relevant legislation, and to ensure that there can be no suspicion or appearance of corruption, they are expected to abide by the following standards:
- no member of staff or person acting on behalf of or providing services for the University shall seek a financial or other advantage for the University through bribery; nor shall they offer, promise, give, request, agree to receive or accept a bribe for any purpose;
 - the payment or acceptance of facilitation payments is unacceptable and will not be tolerated, except where the relevant territory specifically permits such payments in its written law;
 - staff and persons acting on behalf of or providing services for the University must abide by the University Policy on Gifts and Hospitality; and
 - any suspicion of bribery should be reported immediately through the channels defined by this Policy, and the University will consider appropriately all such reported instances.

5. Responsibilities

- 5.1 The Chief Financial Officer and Registrar are jointly responsible for ensuring that this Policy is implemented and maintained. Deans of Faculty and Directors of Services are responsible for ensuring that staff within their faculties, divisions and departments, affected students, and other associated persons are made aware of this Policy.
- 5.2 Every member of staff and associated person who acts on behalf of or provides services to the University is responsible for ensuring that they comply at all times with this Policy and guard against the commission of bribery and/or fraud.

6. Third parties

- 6.1 The University expects third parties acting for or providing services to the University not to commit bribery and will take appropriate measures and action should it discover that third parties are engaging in bribery and/or fraud. Third parties are advised, therefore, to make themselves fully aware of the provisions of this Policy and, in particular, the standards relating to bribery and/or fraud.

7. Exceptions

- 7.1 The University recognizes that exceptional instances might arise in which a bribe or facilitation payment is demanded of a member of staff or person acting for or providing services to the University where refusal may cause immediate personal danger to that individual. In such circumstances, where there is a real and immediate threat to life, limb or liberty, payment is permitted but must be reported, in accordance with the procedures set out in Section 9, either when the event occurs or as soon as possible thereafter.

8. Risk Assessment

- 8.1 Bribery and/or fraud risk should be regularly assessed as a specific part of the wider risk assessment and management performed by the staff identified at Section 5.1 above. Significant transactions – those that are of high value, or high risk, or high

profile – should always be subject to a specific risk assessment. High-risk transactions are those where there is a significantly increased risk of bribery and/or fraud due to the nature of the transaction, the third party, territory, opportunity or sector.

- 8.2 A risk assessment questionnaire is provided at Appendix A; it is split into three parts as follows:
- The nature of the activity;
 - The location of the activity; and
 - The relationship with third parties.
- 8.3 In addition to facilitating the identification of risk factors, the questionnaire also provides an assessment of possible mitigating controls. This can be used in a number of ways: as a means of confirming that controls are already in place for the identified risks; as a means of measuring progress towards introduction of controls; or as a means of identifying potential controls where none already exist in whole or in part. Controls should be considered for their adequacy and proportionality.
- 8.4 The questionnaire is intended to provide a starting point for consideration of the potential risks and a means of focussing on how those risks might be addressed.

Due Diligence

- 8.5 When considering new relationships with third parties the question of 'due diligence' may arise, i.e.: the necessary checks to ensure that the third party in question is bona fide and free from the risk of association with bribery and fraud. Using a supplier who in turn may use practices that are corrupt or illegal, for example, is not only embarrassing by association but, depending upon the nature of the relationship, could result in the University being prosecuted for not preventing bribery or for having inadequate procedures.
- 8.6 Appendix B provides a checklist, therefore, of broadly generic considerations that may help. In most cases due diligence is only required when considering other organisations and where a significant, strategic or long-term relationship is envisaged. The principles apply equally to individuals, however, so if there is any heightened risk around such relationships (e.g. agents or consultants) then consideration should be given to applying the checklist also, in whole or in part.
- 8.7 Appendix C provides a list of indicators, derived from a set created by the Serious Fraud Office, can point to the presence of bribery and/or fraud. Care must be exercised when using them as no indicator in itself is a certain measure of corruption occurring. If trends emerge, however, or if a significant number of indicators cannot be satisfactorily explained then this is likely to warrant further investigation.

9. Procedure for Dealing with Suspected Instances of Bribery and/or Fraud

- 9.1 Individuals who reasonably suspect the occurrence of bribery and/or fraud in the context of the University's activities should report their concerns as soon as possible to the Chief Financial Officer or the Registrar, providing a brief description of the alleged irregularity, and any evidence that supports the allegations or irregularity and identifies the individual or individuals responsible.
- 9.2 Any report will be treated as a disclosure under the University's Whistleblowing Policy and it will, therefore, be brought to the attention of the appropriate senior officer identified at Sections 4.1-4.7 of the Whistleblowing Policy.

- 9.3 Subjecting people who have reported reasonably-held concerns or suspicions to any detriment will be regarded as a disciplinary offence, as will abuse of process by making malicious allegations.

Bribery and Fraud Review Group

- 9.4 Where the senior officer referenced at Section 9.2 above determines that there is a case to answer, the matter will be considered by a Bribery and Fraud Review Group comprising:
- A member of the Risk, Audit and Compliance Committee;
 - The Chief Financial Officer;
 - The Registrar; and
 - The Head of Legal Services.
- 9.5 With the agreement of all other members of the Bribery and Fraud Group, the officers named may send nominated delegates on those occasions when they are unavailable in person.
- 9.6 The Bribery and Fraud Group may call upon the advice of any other person with specialist, technical or professional knowledge that may be relevant to the particular case under consideration. If at any point there is a suspicion that the conduct complained of includes unlawful conduct, the Bribery and Fraud Group will take immediate steps to secure appropriate professional advice as to the steps required before proceeding further.
- 9.7 The Bribery and Fraud Group will decide on such further steps as are necessary including:
- investigating the concerns;
 - notifying the police and other relevant authorities;
 - establishing and securing evidence necessary for criminal and disciplinary action;
 - ensuring that appropriate action is taken against those responsible;
 - communicating with internal personnel and outside organisations with a need to know; and
 - ensuring that the relevant actions are undertaken as soon as is reasonably practicable.
- 9.8 In any case where immediate action is required, the Chief Financial Officer and and/or Registrar may take the steps they deem necessary. Where such action is taken, these steps will be reported to the rest of the Bribery and Fraud Group as soon as possible thereafter.
- 9.9 In any case where a member of the Bribery and Fraud Group is the subject of an investigation under the Policy, the Vice-Chancellor or, if they are the subject of complaint, the Chair of the Risk, Audit and Compliance Committee will appoint an alternate or alternates to fulfil the role or roles specified under the Policy.
- 9.10 Investigations will normally be carried out by member of the Executive Group or an alternative agreed by the Bribery and Fraud Group, taking account of appropriate professional practice, and any relevant guidance issued from time to time by the OfS, the Charity Commission or any other relevant regulatory body. The investigator will keep the Bribery and Fraud Group informed as to the progress of the investigation and will complete the investigation as soon as reasonably possible.

Staff involvement and suspension

- 9.11 Where an allegation of bribery and/or fraud concerns a member of staff, the Head of Human Resources must be consulted.
- 9.12 Subject to the advice of the Head of Human Resources, any member of staff suspected of bribery and/or fraud may be suspended (without deduction of pay) pending a full investigation. No one person, acting on his or her own volition, may move to suspend a member of staff in such circumstances. The suspension of a member of staff does not constitute a finding of misconduct against them. Any staff suspended as a result of a suspected bribery and/or fraud will be informed of the reason for the suspension.
- 9.13 Individuals suspended for suspected bribery and/or fraud, and individuals suspended to enable a proper investigation to be carried out, will normally be required to leave University premises immediately and will be denied access to the University's IT facilities. During the period of any suspension they will not be permitted to return to the premises, to make contact with staff or witnesses, or to act on behalf of the University, unless given express permission to do so by the relevant University authorities. Any infringement of this requirement may be treated as a disciplinary offence.
- 9.14 All persons involved with the investigation must treat the information in strict confidence. Where necessary, information will be transmitted in confidence to relevant regulatory bodies. An unwarranted breach of confidence may be the subject of disciplinary action.

Student involvement

- 9.15 In cases which involve or may involve students, the Pro Vice-Chancellor & Director of Student Services will be informed at the outset of the investigation. If a student is the subject of an allegation of bribery and/or fraud, this will be dealt with by the Student Conduct Manager under the disciplinary procedures applicable to students.

Police involvement

- 9.16 In all cases where the police are involved, the University reserves the right, where it would be reasonable to do so, to proceed with its own disciplinary procedures and/or with civil proceedings.

Interim Reporting

- 9.17 Where the senior officer referenced at Section 9.2 above determines that there is a case to answer, the Chief Financial Officer and/or Registrar will notify the Vice-Chancellor and the Chair of the Risk, Audit and Compliance Committee that a matter has been reported and will be investigated under this Policy; the Bribery and Fraud Group will provide further and confidential interim reports as are deemed necessary. Such reports may be oral or written.

Final Report

- 9.18 The investigator will prepare a report of their investigation for submission to the Bribery and Fraud Group: the Bribery and Fraud Group will be responsible for considering the findings and making recommendations to the Vice-Chancellor. The final report will be provided in strict confidence to the Vice-Chancellor and to the Chair of the Risk, Audit

and Compliance Committee. The Chair of the Risk, Audit and Compliance Committee may, at their discretion, share the final report in strict confidence with the Council.

9.19 As a guide, the final report will contain:

- a description of the allegations and the steps taken to investigate them;
- a conclusion as to whether the allegations made had substance and if so the extent of any adverse impact on the University;
- a description of any steps taken in relation to the individual or individuals concerned together with recommendations as to any disciplinary action;
- the measures taken to minimise the risk of a recurrence; and
- any action needed to strengthen future responses to incidents of bribery and/or fraud, which may include provision for a follow-up report within a specified time frame.

10. Record Keeping

10.1 The Head of Legal Services will maintain, on behalf of the Chief Financial Officer and Registrar, a register of all allegations of bribery and/or fraud which are reported within the University including those where there was found to be no case to answer.

10.2 The Register will include the following information:

- what the suspected or actual incident was;
- whether the incident was suspected or actual;
- when the suspected or actual incident occurred;
- what the actual and potential impact of the incident on the University might be;
- what inquiries were made and/or action was taken, including any reports to other regulators or the police;
- how any decision to terminate the investigation of the incident was made, and why;
- what policies and procedures were in place that applied to the incident, whether they were followed, and if not, why;
- whether policies and procedures need to be introduced or revised, and if so, how and by when; and
- the date that the final report was provided to the Vice-Chancellor and Chair of the Risk, Audit and Compliance Committee.

11. Communication

11.1 Subject to the findings of the final report and agreement of recommended actions, the individual or individuals involved will be informed of the outcome as soon as possible after its presentation to the Vice-Chancellor and Chair of the Risk, Audit and Compliance Committee.

11.2 The complainant will be informed in broad terms of the outcome of the investigation, having due regard to the confidentiality of information relating to the individual or individuals accused and others identified in the report.

12. Notifying the OfS and Charities Commission

12.1 The Chief Financial Officer or Registrar will notify the Office of Students and Charities Commission of any serious allegations or incidents of bribery as required by law.

Appendix A: Risk Assessment Questionnaire

1. The nature of the activity

(i) Context:
Generally, University activities should be at low risk of corruption: the potential rewards being less than in some areas of commerce or industry. Specifically, however, there are areas of potential raised risk – so consider the activity in question within the context of the following elements.

(ii) Increased risk factors:		
The following factors increase risk in respect of the nature of the activity under consideration. Place a tick against all those that apply:		
	Indication of whether this risk applies:	Tick
(a) Major purchases – dealing with major acquisitions, purchases and tenders (over £100k), including property, equipment, IT, etc.		
(b) Major sales – dealing with sales over £100k, including business development and pursuit of targets, negotiations, and contracts.		
(c) Donations – dealing with philanthropic and commercial donors and sponsors, actual and potential (i.e. <i>excluding</i> regular research grant sponsors).		
(d) Recruitment & admissions – of staff or students, where this is a significant part (exceeding 20%) of the activity under consideration.		
(e) Division of responsibilities – are decisions or actions in any of the above areas taken by single trusted individuals without additional check or supervision?		

(iii) Mitigating controls:				
University policy and procedures guard against general risk. Consider also the following controls as a means of further mitigating the factors identified above. Use the 'level of implementation' boxes to indicate whether such controls are already in use (in full or in part), or otherwise.				
	Level of implementation:	None	Part	Full
(a) Training and awareness – both those responsible for running the activity and all staff who undertake the activity should have received bribery awareness training and have access to reference material (full implementation). (If only directors and managers, or staff undertaking the activity, or not all in either case have received the training then show partial implementation.)				
(b) Procedural controls – all processes and controls within the activity are documented, up to date and regularly reviewed, ideally with audit sign-off (full implementation). (If processes are documented in part, are not up to date or regularly reviewed, then show partial implementation.)				

<p>(c) Control of opportunity – either: no staff involved in the management or provision of the activity are permitted to receive gifts or hospitality from third parties; or ALL instances of gifts and hospitality received are formally recorded (full implementation); (If the receipt of gifts and hospitality is permitted but only those items recorded that are required as the minimum under University rules, then show partial implementation.)</p>			
<p>(d) Division of responsibilities – where this is an issue, ensuring that the areas at risk are split between at least two individuals and/or key decisions are reviewed and counter-signed by a line manager or supervisor.</p>			

2. The location of the activity

<p>(i) Context:</p>
<p>The majority of University activities that are undertaken within the UK should be at low risk of corruption. Some activities may be performed overseas, however, in whole or in part, and some in territories where corruption is a greater endemic risk.</p>

<p>(ii) Inherent risk:</p>	
<p>The Corruption Perceptions Index, an exercise that measures perceived levels of public sector corruption globally (and by proxy may be taken as a reflection of wider cultural attitudes within the countries concerned). It is compiled annually by Transparency International – www.transparency.org Consider where the activity in question takes place or is delivered, and whether staff are engaged there long-term or only on short-term visits.</p>	
<p>Indication of whether this risk applies:</p>	<p>Tick</p>
<p>(a) High risk – long-term engagement (over 12 months) or frequent short-term visits to territories rated with a score lower than 50 on the TI Corruption Perceptions Index.</p>	
<p>(b) Medium risk – occasional short-term visits to territories that are rated with a score lower than 50 on the TI Corruption Perceptions Index.</p>	
<p>(c) Medium risk – long-term engagement or frequent short-term visits to territories that are rated with a score of 50 to 69 (inclusive) on the TI Corruption Perceptions Index.</p>	

<p>(iii) Mitigating controls:</p>			
<p>University policy and procedures guard against general risk. Consider also the following controls as a means of further reducing the inherent risk identified above. Use the 'level of implementation' boxes to indicate whether such controls are already in use (in full or in part), or otherwise.</p>			
<p>Level of implementation:</p>	<p>None</p>	<p>Part</p>	<p>Full</p>
<p>(a) Training and awareness – <i>country-specific</i> guidance and bribery awareness training for both those responsible for running the activity and all staff who undertake the activity, with access to guidance and reference material (full implementation). (If only some staff have received the training, or the guidance provided has been generic rather than country-specific, then show partial implementation.)</p>			

<p>(b) Procurement controls – <i>either</i>: all purchases are made within the UK; or all purchases over £5k are made in the UK, whether or not in either case they are subsequently shipped to the country in question (full implementation). (If standard University purchasing processes and reimbursement of expenditure are applied without the additional measures outlined above, then show partial implementation.)</p>			
<p>(c) Cash and income control – all sales or income relating to the activity are handled within the UK / there are no sales or income (full implementation). (If sales and income are handled in-country to fully documented procedures then show partial implementation).</p>			
<p>(d) Recruitment control – all recruitment of staff or workers on the activity is handled within the UK / there is no staff recruitment involved (full implementation). (If recruitment is handled in-country, but to fully documented processes that involve University-trained staff, then show partial implementation.)</p>			

3. The relationship with third parties

<p>(i) Context:</p>
<p>For corruption to occur the normal relationship with third parties (suppliers, customers, students, etc.) needs to be subverted in some way. Certain types of relationship are at higher risk than others, due to the practices of the sectors in which they operate, the availability of means to enable corruption, or the potential rewards at stake.</p>

<p>(ii) Increased risk factors:</p>	
<p>The following factors increase risk in respect of relationships with third parties. Place a tick against all those that apply:</p>	
	<p>Indication of whether this risk applies: Tick</p>
<p>(a) Use of agents, partners or associates – intermediaries acting with or on behalf of the University in any capacity (including joint ventures), but particularly in an overseas context.</p>	
<p>(b) Origin – irrespective of where the activity is delivered, the territories from which third parties (students, suppliers, partners, customers, etc.) originate may increase risk, particularly if the main or majority relationship is with individuals or organisations that originate in those territories identified as 'High Risk' under section 'B' above.</p>	
<p>(c) Reputation – if the reputation or past track record of a third party shows a likelihood for bribery or corruption then this increases risk.</p>	
<p>(d) Construction industry / land & property purchases – as a sector, is subject to heightened risk of bribery and corruption.</p>	
<p>(e) Public officials – there is heightened risk if there is a significant need to deal with public officials or politicians as part of the activity; more so if they originate from territories identified as 'High Risk' under section 'B' above.</p>	
<p>(f) Licences – where there is a particular need for licences, approvals, visas, etc. to be granted by authorities (particularly when dealing overseas).</p>	

(g) Pressure sales – some suppliers (or potential students or applicants) may resort to underhand tactics in order to close a deal; consider whether this is a likely risk.	
(h) Complex relationships – multi-stranded relationships (e.g. where a supplier is also a donor; or where a project deals with multiple sub-contractors) should be individually identified as potential sources of heightened risk.	

(iii) Mitigating controls:				
University policy and procedures guard against the general risk. Consider also the following controls as a means of further mitigating the risk factors identified above. Use the 'level of implementation' boxes to indicate whether such controls are already in use (in full or in part), or otherwise:				
	Level of implementation:	None	Part	Full
(a) Training and awareness – as with the previous areas, training of both those responsible for running the activity and all staff who undertake the activity should be a priority, with particular emphasis on the risk factors identified (full implementation). (If only directors and managers, or staff undertaking the activity, or not all in either case have received the training then show partial implementation.)				
(b) Due diligence – comprehensive background checks are performed and formally recorded on all significant third parties prior to engagement (full implementation). (If partial checks are performed then show partial implementation.) Further guidance on due diligence checks is provided at Appendix 2.				
(c) Contractual controls – all relationships with third parties are subject to contracts or similar agreements that include the University's approved wording on bribery (full implementation). (If only some agreements meet this standard then show partial implementation.) Consider also the jurisdiction under which contracts are agreed, with preference in most cases for English Law – if in doubt, seek further advice from Legal Services.				
(d) Communication – third parties, particularly agents, have received clear guidance on the University's Anti-Bribery requirements and have provided signed acknowledgement of their obligations (full implementation). (If communication is provided but no acknowledgement obtained, then show partial compliance).				

Appendix 4 – Due diligence considerations

The following is a generic checklist of broad considerations that might be used as a starting point for checking the background of third parties:

<p>Financial Controls</p> <p>It is usually possible to obtain the published accounts of most organisations, but although these may reveal indicators on performance, financial stability, etc. they are unlikely in themselves to reveal much that is specific to anti-bribery risk.</p> <p>Of more use is to request a copy of the organisation’s policy and procedures relating to bribery and/or fraud and to compare these with those of the University as a benchmark. Large organisations, even those based overseas, should be able to provide this information without problem – it may be a useful indicator of potential risk, therefore, if a large organisation struggles to do this. For smaller organisations and sole traders this may be more of a challenge, even though those based in the UK are bound in the same manner as the University to ensure that they have ‘adequate procedures’ against bribery – in instances where smaller organisations cannot meet this request there is an opportunity to make them aware of the University’s own policy and procedures and obtain written acknowledgement from the third party that they will abide by them.</p> <p>The risk of bribery increases with the value and volume of business, since the potential rewards are also greater. Consider a proportionate response, therefore, to checking on the background of third parties so that more effort is directed to those where the risk is higher.</p>
<p>Reputation</p> <p>Consider whether there are any negative reputational issues associated with the third party that might also reflect negatively on the University. This is true both generally and specifically in respect of any bribery or fraud related issues.</p> <p>Coverage in national or global media – now generally searchable online – will usually reveal whether the organisation has been involved in or associated with any deals or arrangements that may be suspect. If preliminary searches do reveal potential issues then it is worth referring the matter to the Legal Services Office for further advice on how to proceed.</p> <p>Nor should it be assumed that large, multi-national corporations are low risk prospects simply because of their size and longevity – it is often such companies who, because of their global reach, become embroiled in issues of bribery and corruption, as a quick search of the media will show.</p>
<p>Basis of Agreement</p> <p>All significant or ongoing arrangements with third parties should be governed by a formal agreement, usually a contract, that includes reference to the University’s standard clauses on bribery prevention, or equivalent clauses supplied by the third party.</p> <p>You are advised to take further advice from the Legal Services Office where organisations are reluctant to sign up to contracts including these specific clauses.</p> <p>Where the relationship with the third party is one of agency, partnership, or other association in which they act as an intermediary or on behalf of the University in any way, it is particularly important that there is a contractual arrangement, as outlined above, put in place. You should also consider, however, making the third party fully aware of the University’s policy, procedures and guidance on bribery and ask them to provide written confirmation in some form that the material has been read and understood.</p>

Conflicts of Interest

University rules do not permit staff or representatives to accept gifts or hospitality from suppliers either immediately before or during a tendering process. There is a similar prohibition on gifts or hospitality offered by prospective staff or students whilst a recruitment or admissions process is underway.

When considering third parties and the risk of bribery and corruption, therefore, it is also wise to consider whether there are any in-house conflicts that are created by proposed relationships and whether those conflicts have been declared and managed. Staff involved in decision-making or negotiating processes, for example, should have no private interest in particular third parties – such interests could include business or financial relationships with that party outside of the University context, or family connections.

Any potential conflicts of interest should be managed under the University's *Conflicts of Interest Policy*, and anyone who finds themselves conflicted should immediately disassociate themselves from the process concerned and make the necessary report under this policy.

Appendix C: Serious Fraud Office Warning Indicators

Corruption Indicators	
(a)	An abnormal or unexplained pattern of cash payments, either to a third party or to another individual within the organisation;
(b)	Pressure exerted by a third party for payments to be made urgently or ahead of schedule (these may include insistence on a commission or fee before agreeing to sign up to a contract);
(c)	Requests for payment (claims, invoices, etc.) or for financial or privileged information from unrecognized third parties, or recognized third parties in an unusual manner.
(d)	Any arrangement to conduct business or make payments to an organisation or individual via a third party not directly associated with that organisation or individual (this may also include payments to be made to a location different from that in which the organisation or individual normally resides or does business);
(e)	Abnormally high commission rates or fees being paid to a particular agent, whether as a single sum, or split into separate smaller sums, or invoices being agreed in excess of contract pricing without reasonable cause;
(f)	Lavish gifts or entertainment being offered, received or proposed from/to third parties;
(g)	An individual who is involved in the decision-making or selection process having private, secret or 'off the record' meetings with potential suppliers (or clients) before a tendering process, or with potential students prior to or during a recruitment process;
(h)	An individual who is involved in the decision-making or selection process making unexpected or illogical decisions when accepting proposals or contracts – this could include an unexplained preference for certain suppliers/clients/students, or agreeing to unfavourable contract terms;
(i)	A frequent or unjustifiable insistence that normal approval or decision-making processes be sidestepped, whether through bypassing normal procedures, independent checks, or acting under 'delegated powers';
(j)	Blocking or hindering roles and activities (such as audit and scrutiny) that bring a degree of independent check and transparency to the organisation's activities – this could include blocking or hindering access to specific roles or departments that might be involved in sales, purchasing, payment, or record-keeping activities;
(k)	An individual never taking time off work, even for illness or holidays, or insisting on being the only person who deals with certain suppliers or clients personally;
(l)	A lack of adequate record of discussions, agreements or transactions (financial or otherwise) – this may range from no records at all and an insistence that nothing is put in writing, through to incomplete records or gaps and the use of side-letters to formal agreements.