

ANTI-BRIBERY POLICY

Rev	Date	Purpose of Issue/Description of Change	Equality Impact Assessment Completed
1.	29 th March, 2012		
2.	5 th October 2015	Review and approval by Compliance Task Group	1 st December 2015
3.	3 rd June 2019	Review and approval by Compliance Task Group	
4.	22 nd September 2022	Amendments to update roles and responsibilities	

Policy Officer	Senior Responsible Officer	Approved By	Date
Head of Legal Services	University Secretary	Compliance Task Group	22 September 2022

This Policy will be reviewed in 3 years

1. Purpose

Bangor University is subject to the requirements of the Bribery Act 2010 (the Act). This Policy sets

(d)

Please note that facilitation payments are illegal in the UK. Care needs to be taken when

SANCTIONS

(A) Criminal Liability

1. Individuals

The maximum penalty for people convicted under the Bribery Act is 10 years imprisonment and/or personal fines.

Individuals may also be disqualified from being directors under the Company Directors Disqualification Act 1986

2. University

Unlimited fines may be imposed on organisations for failing to prevent bribery. The Serious Fraud Office has indicated that these are likely to be significant amounts. Organisations may also be debarred from bidding from public contracts.

Senior Officers and the University can both be liable if it can be shown that the University committed an act of bribery with the consent or connivance of a senior officer of or by a person purporting to act in such capacity.

(B) Civil Liability

In addition, or as an alternative to the criminal penalties, an action may be brought for the recovery of proceeds of crime under the Proceeds of Crime Act 2002, Part 5.

A. Countries Perceived to be high risk for Corruption

Transparency International annually publishes the Corruptions Perceptions Index (“CPI”) which is a useful indicator on the risks of corruption in any said country.

<https://www.transparency.org/cpi2018>

B. Sectors Perceived to be high risk for Corruption

The Bribe Payers Index (“BPI”) lists industry sectors in accordance with statistics ranging from bribing officials to frequency of bribes. The up to date survey is available at

<https://www.transparency.org/research/bpi/overview>

A summary of the list is as follows with the cleanest sectors at the bottom and worst offenders at the top:-

1.

Anti Bribery Clause

The University has decided to adopt a policy of best practice in ensuring that as far as possible, the University's standard anti-bribery clause (as set out below) is inserted into relevant contracts (such as contracts for services) relating to the University and its wholly owned subsidiaries.

The clause is:

1.1 The [Contractor] shall:

- a. comply with all applicable laws, statutes, directives and/or regulations relating to anti bribery and anticorruption including but not limited to the Bribery Act 2010;
- b. not engage in any activity, practice or conduct which would constitute an offence under the Bribery Act 2010;
- c. comply with Bangor's Anti-Bribery Policy or equivalent (as amended from time to time), a copy of which is available from the Governance and Compliance Office including but not limited to implementing 'adequate procedures' in line with the guidance issued by the Secretary of State under section 9 of the Bribery Act 2010;
- d. promptly report to Bangor any request or demand which if complied with would amount to a breach of either this Agreement or Bangor's Anti-Bribery Policy;
- e. eei

If you have any questions or comments about the clause and its application to your contract please contact the Contracts Officer in the Research, Innovation & Impact Office in the first instance.