



Anti-Bribery Policy

Version 4

Approved by the Board of Governors

Last Amendment: October 2023

This policy sets out the School's commitment to conducting all of its business in an honest and ethical manner. The School will uphold all laws relevant to countering bribery and corruption, including *the Bribery Act 2010*, in respect of its conduct both at home and abroad.

The purpose of this policy is to:

- i. publicly communicate to third parties our position on bribery and corruption; and
- ii. to set out the responsibilities of the School, and of those working for it, in observing and upholding our position on bribery and corruption.



Document Information

Document owner(s)*:	Deputy CEO; and General Counsel
Date of next review:	September 2024
Document Status:	IN USE
Dissemination:	For general Publication

*The document owner is responsible for maintaining and updating the content of this document and ensuring that it reflects current practice at the School.

Contents

1. Introduction	2
2. Our commitment starts at the top:	2
3. Who does this policy apply to?	2
4. Consequences of breaches of the policy for employees and directors	3
5. Business consequences for LSST where bribery takes place.....	3
6. Consequences for those who provide goods and services to us	3
7. How we communicate this policy.....	3
8. What you should do if you are subject to an offer of a bribe or asked to make one	4
9. Recognising what is and what is not a bribe.....	5
10. Raising concerns.....	6
11. Due Diligence and new business relationships.....	6
12. Risk Assessment.....	7



1. Introduction

- 1.1. We are committed to carrying out business fairly, honestly and openly. The School takes a zero-tolerance approach to bribery and corruption and is committed to acting professionally, fairly and with integrity in all of its business dealings and relationships.
- 1.2. The School recognises that bribing someone for an academic advantage is academic fraud and dishonesty, and these matters will be dealt with through the School's Academic Integrity policy.
- 1.3. The purpose of this policy is to:
 - i. publicly communicate our position on bribery and corruption; and
 - ii. to set out the responsibilities of the School and of those working for it in observing and upholding our position on bribery and corruption.
- 1.4. In our approach to combatting bribery and corruption, due regard is given to the principles set out in the *Bribery Act 2010* and associated guidance published by the Ministry of Justice (<http://www.justice.gov.uk/downloads/legislation/bribery-act-2010-guidance.pdf>) these being:
 1. Proportionate Procedures
 2. Top-Level Commitment
 3. Risk Assessment
 4. Due Diligence
 5. Communication (and Training)
 6. Monitoring and Review
- 1.5. This policy will be reviewed annually as part of a general policy review and whenever a major change in LSST's circumstances (e.g. international expansion) warrants it, in accordance with Principle 6.

2. Our commitment starts at the top:

- 2.1. The Directors and Executive Committee are personally committed to this policy. The Principal and the Head of Quality are always available to discuss any concerns about this policy. The Executive Committee will regularly review this policy and its implementation.

3. Who does this policy apply to?

- 3.1. This policy applies to everyone who is employed by LSST. This includes all directors, managers, employees (whether permanent or on fixed-term contracts, full-time or part-



time, etc.), as well as anyone who is not an employee (such as consultants, sub-contractors, agents and representatives).

4. Consequences of breaches of the policy for employees and directors

- 4.1. Any employee of LSST who offers, makes or receives a bribe will be subject to disciplinary procedures, which are likely to result in their summary dismissal for gross misconduct. Bribery is a crime and can carry a sentence of up to 10 years in jail with the possibility of an unlimited fine. Anyone found to have offered, made or received a bribe may additionally be subject to prosecution.

5. Business consequences for LSST where bribery takes place

- 5.1. If we are involved in bribery or those who work for us or with us or on our behalf, such as markers or tutors, accept payment to award a higher grade or give a student preferential treatment, or if a director or manager accepts a bribe to influence their decision as to which suppliers or contractors to use, there can be serious consequences.

For example:

- reputational damage to the Company (including being subject to unfavourable press, TV and social media scrutiny);
- loss of award-validating partnerships with universities;
- loss of other business-critical partnerships contracts;
- those who buy our goods and services may no longer do so;
- if we are convicted of bribery we may have to pay over whatever amounts we have received from any business or contracts entered into pursuant to a bribe;
- we could be stopped from trying to obtain work with some type of contracts with public organisations; and
- we could be stopped from trying to obtain work from certain international bodies.

6. Consequences for those who provide goods and services to us

- 6.1. If a company or a person who provides goods and/or services to LSST has used bribery to do so, we will normally cease any business transactions with that company or person immediately. For our agents and others acting on our behalf, if they breach this policy, let alone offer, make or receive a bribe, LSST will terminate any contracts immediately with them.

7. How we communicate this policy



7.1. This policy is made available in the following ways:

- It is available on our website;
- A copy of this policy is provided to every new employee, consultant, sub-contractor or anyone who works for or with us or on behalf of us and it is summarised;
- Those working with us (employees and non-employees) who are most likely to be affected by bribery will receive detailed training on practical aspects of the policy including on how to recognise and deal with bribery; and
- Every new person or organisation we enter into a contract with to provide our services will receive a copy of this policy, or will be provided with a link to this policy on our website, as proportionate to the nature, length, and scale of the business relationship.

8. What you should do if you are subject to an offer of a bribe or asked to make one

8.1. If you are asked to make a bribe or you are offered a bribe (whether a mere offer or the actual making of it), you must refuse to make or receive the bribe. In normal circumstances:

- you should explain our policy regarding bribery;
- you should refuse to make or receive (as the case may be) a bribe;
- you should also report it if you suspect an act of bribery; and
- report the matter immediately to the Deputy CEO, Mr. Ali Jafar Zaidi, and/or the Principal, Dr George Panagiotou.

We recognise that in certain circumstances you may feel that your personal safety is at risk if you are asked to make or receive a bribe. It may not be safe for you to explain our policy or to refuse to make the bribe. In such circumstances our first concern is for your safety and you should do what is necessary to protect yourself and then you will need to report what has occurred as soon as possible to the Deputy CEO and/or the Principal.

8.2. Investigations into suspected fraud, bribery and corruption will be carried out in a fair and impartial way.

8.3. The School will ensure that no individual is unfairly penalised for having made a disclosure of bribery. Such disclosures are protected in accordance with the School's *Protected Disclosures (Whistleblowing) Policy*, regardless of whether the disclosure is found to be without merit, provided it has been made in good faith.



9. Recognising what is and what is not a bribe

9.1. It is not always easy to recognise a bribe from a legitimate payment we make or receive. Also, in our business we regularly engage in hospitality (e.g. with representatives of awarding bodies, etc.).

9.2. Hospitality, gifts and charitable donations within reasonable guidelines are not normally illegal and are a perfectly acceptable way of establishing and building contacts and relationships with potential and actual customers as well as our suppliers.

Please note that the maximum guidelines for giving or receiving hospitality/entertaining costs are:

- £10 to £40 per head without prior authorisation for daytime entertaining (e.g. meeting an agent for coffee/providing refreshments for visiting University or government agency officials or external training organisations). If this hospitality is being provided by LSST or its staff, a receipt must be promptly provided to the Finance Office.
 - £50 per head maximum with prior authorisation from the Finance Office (e.g. for evening entertaining or hospitality for officials).
- 9.3. It will generally be acceptable to accept or buy refreshments when meeting representatives of outside organisations within the above guidelines, or for hosting presentations and corporate hospitality for key stakeholders or to receive thank you gifts up to a maximum value of £25 from students at the end of the course. It will also usually be acceptable to reimburse travel expenses for visiting representatives of Universities or other key business stakeholders.
- 9.4. Any charitable gift whether made by a third party or to be made by us needs the approval of the School's Chief Financial Officer.
- 9.5. Requests to make or receive payments other than those that relate to the normal course of our business must always be treated with caution. The following are non-exhaustive examples of situations which should be reported to the Deputy CEO and/or the Principal:
- Offers of or offering hospitality exceeding the maximum price per head guidelines;
 - Offers of 'free' equipment, holidays etc. from a salesperson in return for signing off on a supplier's contract for equipment;
 - Offering or accepting payment or a discount or other benefit in return for paying tradesmen or salespersons 'cash-in-hand' or without VAT;



- Demanding or accepting payment or other benefit to alter or influence a mark or provide a student with preferential treatment;
- Demanding or accepting payment or other benefit to avoid disciplinary/plagiarism proceedings against a student or colleague;
- Demanding or accepting payment or other benefit from an agent or student to extend deadlines, or keep an agent or supplier 'off the books';
- Demanding or accepting payment or other benefit from an agent, employee or student to influence decisions on assignment of CAS/CoS or reporting in accordance with Tier 4/Tier 2 Sponsor duties;
- Demanding or accepting payment or other benefit to influence choice of contract status (i.e. employee/contractor/self-employed, full-time/casual, fixed term/permanent).

10. Raising concerns

- 10.1. We wish to encourage you to raise any concerns or suspicions you may have as soon as you have them even if you are not sure whether what has occurred amounts to bribery, whether it is a payment, the actions of another employee or an action of someone who provides goods or services to us.
- 10.2. We urge you to raise your concerns with the Deputy CEO and/or the Principal. The Executive Committee encourages the reporting of concerns and suspicions and reiterates that if you do so you will not be subject to any disciplinary action or unfavourable treatment. If you consider that you have been subject to such action or treatment, please use our grievance procedure.

11. Due Diligence and new business relationships

- 11.1. In accordance with Principle 4 of the Bribery Act 2010 Guidance, LSST requires the following when entering into new business relationships:-
- **Staff and students on application for admission/at induction:** personal photo ID such as a passport or driving licence.
 - **Limited company contractors and suppliers** (where not a one-off transaction e.g. a tradesman carrying out a repair, and where a relationship is long-term, which we consider to be 12 months or more): details of company name, number and

correspondence address, so that a search can be carried out against Companies House records.

- **Consultant/Self-Employed Contractors:** ID as for staff and students, ideally a copy of letterhead if used.

12. Risk Assessment

12.1. In accordance with Principle 3 of the Bribery Act 2010 Guidance this policy has been informed by the below Risk Assessment:-

Risk	Low/Routine/High	Details
Country Risk	Low	LSST currently operates entirely within the UK and does not accept referrals of students from overseas third-party recruitment agents.
Sectoral Risk	Low	The Higher Education sector is not a high-risk sector for bribery.
Transaction Risk	Routine	<p>Transaction risk arises in the following contexts:-</p> <ul style="list-style-type: none"> • attempts to influence academic judgement and admissions decisions • introduction payments for referrals of students by third parties, including other students • attempts to subvert or influence disciplinary proceedings <p>These have been accordingly addressed in this Anti-Bribery Policy.</p>
Business Opportunity Risk	Routine	<p>Business opportunity risk can arise in the following contexts:</p> <ul style="list-style-type: none"> • the use of contractor



		<p>teaching staff</p> <p>These have been addressed in this Anti Bribery Policy.</p>
Business Partnership Risk	Low	LSST does not enter into agreements with foreign officials or organisations through intermediaries and does not routinely deal with politically exposed persons.
Internal Risks	Low	Substantially all of LSST's financial dealings are controlled and approved through appropriately trained staff in the Finance Office. LSST's bonus structure is linked to overall conduct and performance and not just revenue targets to discourage risk taking. The management fully engages with this Anti-Bribery policy, which is made available to all personnel and new business partners.



Version History

Version	1.0 – 3.1	
Original author(s):	Deputy CEO Legal Advisor	
Reviewed by:	Executive Committee	September 2017 September 2018 September 2019
Version	3.2	
Revised by:	Deputy CEO Quality Unit	
Revision summary:	<i>Annual review – minor factual corrections. Formatting and version control applied.</i>	
Reviewed by:	Board of Governors	October 2020
Version	3.3	
Revised by:	Deputy CEO Quality Unit	
Revision summary:	<i>Annual review</i>	
Approved by:	Board of Governors	October 2021
Version	3.4	
Revised by:	Deputy CEO General Counsel	
Revision summary:	<i>Annual review – minor factual corrections. Formatting and version control applied.</i>	
Approved by:	Board of Governors	November 2022
Version	3.5	
Revised by:	Deputy CEO	
Revision summary:	<i>Annual review</i>	
Approved by:	Board of Governors	May 2023
Version	4	
Revised by:	Deputy CEO	
Revision summary:	<i>Annual Review- minor grammatical changes. Formatting and version control applied.</i>	
Approved by:	Board Of Governors	October 2023