Anti-Bribery Policy

Version 7.0

Approved by the Board of Governors

Last Amendment: September 2026

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.

This policy forms part of LSST's integrated framework for reporting, investigating, and managing serious concerns. All disclosures are handled in accordance with the Whistleblowing Policy, which provides a single reporting structure and consistent protections.

DOCUMENT INFORMATION

Document owner(s)*: Principal and HR

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

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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:

- Publicly communicate our position on bribery and corruption, and
- 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:

- Proportionate Procedures
- Top-Level Commitment
- Risk Assessment
- Due Diligence
- Communication (and Training)
- 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 imprisonment 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.

5.2. 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.
- 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.
- 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.
- Alternatively, any concerns relating to suspected bribery, corruption, or improper inducements must be raised in accordance with LSST's Whistleblowing Policy.
- Reports should normally be made via whistleblowing@lsst.ac, or to a Designated Officer or the CEO.

8.2. 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 CEO and/or the Principal.

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

8.4. 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.

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

- Up to £40 per head, without prior authorisation, for modest daytime hospitality (for example, coffee meetings or light refreshments for visiting university, awarding body, government agency, or external training organisation representatives). If this hospitality is being provided by LSST or its staff, a receipt must be promptly provided to the Finance Office.

- Up to £50 per head, with prior authorisation from the Finance Office, for evening entertaining or higher-value hospitality, including hospitality involving officials or external stakeholders.

- Hospitality exceeding £50 per head must not be offered or accepted under any circumstances unless exceptional prior written approval is granted by the Chief Financial Officer.

9.4. 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 external representatives of Universities or other key business stakeholders.

9.5. All gifts and hospitality above £50 must be declared in the LSST Register of Gifts and Hospitality via the forms here:

- LSST Gifts Declaration Form – Fill out form
- LSST Hospitality Declaration Form – Fill out form

9.6. All gifts and hospitality above the declaration thresholds must be recorded in the LSST Register of Gifts and Hospitality, owned by the Finance Office and maintained by the Quality Unit.

9.7. 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.

9.8. 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 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 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.

10.3. You may also raise concerns anonymously in accordance with the School's Whistleblowing Policy, which allows confidential reporting where individuals feel uncomfortable identifying themselves.

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	Transaction risk arises in the following contexts:- ● 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 These have been accordingly addressed in this Anti-Bribery Policy.
Business Opportunity Risk	Routine	Business opportunity risk can arise in the following contexts: ● the use of contractor teaching staff These have been addressed in this Anti Bribery Policy.
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

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