# ANTI-BRIBERY AND CORRUPTION POLICY

*Preventing, detecting, stopping and responding to bribery, corruption and improper influence*

| Document control | Details |
|---|---|
| Document title | LAAT Anti-Bribery and Corruption Policy |
| Document reference | LAAT-GOV-ABC-001 |
| Policy owner | Chief Finance and Operations Officer (CFOO) |
| Executive accountability | Accountable Officer |
| Policy custodian | Governance and Compliance Manager / designated Governance Officer, supported by the Finance Manager |
| Executive structure | Executive Leadership Team (ELT): Accountable Officer, CFOO and Dean. Senior Management Team (SMT): ELT plus key managers, including HR, Finance and other designated managers. LAAT does not operate an SLT. |
| Oversight committee | Audit, Risk and Finance Committee (ARFC) |
| Approving body | Board of Governors |
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**Approval condition: role holders, reporting routes and email addresses must be confirmed immediately before Board approval and at each review. No named individual or personal email address should be treated as permanent policy content.**

## Approval, governance and document hierarchy

| Body | Role in approval and oversight |
|---|---|
| ELT | Review operational feasibility, resourcing, immediate implementation and any cross-functional risks. ELT does not approve the policy and receives identifiable case information only where a member has a specific need-to-know role. |
| SMT | Coordinate implementation, training, registers and control improvements. SMT receives anonymised or aggregated thematic information unless a member has a defined case role. |
| Audit, Risk and Finance Committee (ARFC) | Scrutinise the policy and risk framework, receive assurance and material incident reports, monitor remediation, and recommend approval or material amendment to the Board. |
| Board of Governors | Approve the policy, retain ultimate accountability, set the tone from the top, ensure adequate resources and receive annual assurance and immediate reports on reserved or material matters. |

**Document hierarchy and conflict rule**
Applicable law and binding regulatory requirements take precedence. LAAT's Articles of Association, Management and Governance Framework and Scheme of Delegation form the constitutional and governance base. This policy gives operational effect to those requirements. Plymouth Marjon University partnership requirements apply where relevant, but do not displace LAAT's own legal or regulatory responsibilities. Any conflict must be escalated to Governance/ Quality and Compliance, the Accountable Officer and, where material, ARFC and the Board.

## Contents


| | |
|---|---|
| **1** | Purpose, status and intended outcomes |
| **2** | Legal, regulatory, constitutional and partnership context |
| **3** | Scope and application |
| **4** | Definitions |
| **5** | Policy statement and core principles |
| **6** | Governance, independence and responsibilities |
| **7** | Bribery and corruption risk assessment |
| **8** | Prohibited conduct and required controls |
| **9** | Reporting routes and immediate action |
| **10** | Assessment, investigation and outcomes |
| **11** | External and regulatory reporting |
| **12** | Protection, confidentiality, data and records |
| **13** | Training, communication and culture |
| **14** | Monitoring, assurance and review |
| **15** | Breaches, sanctions, recovery and learning |
| **Appendix A** | Operating procedure and target timescales |
| **Appendix B** | Concern report form |
| **Appendix C** | Gifts and hospitality declaration form |
| **Appendix D** | Third-party due diligence checklist |
| **Appendix E** | Annual assurance schedule |
| **Appendix F** | Related LAAT documents and official references |
| | Document approval record |

## 1. Purpose, status and intended outcomes

London Academy for Applied Technology (LAAT) is committed to conducting all of its activities honestly, lawfully, transparently and in the interests of students, the public and the institution. LAAT has zero tolerance for bribery, corruption, kickbacks, facilitation payments and other forms of improper influence.

This policy establishes the standards, responsibilities, controls and reporting arrangements through which LAAT prevents, detects, stops, investigates and responds to bribery and corruption. It is intended to protect students, staff, Governors, partners, suppliers, public funds and LAAT’s reputation, while supporting fair academic, admissions, recruitment, procurement, employment and financial decisions.

The intended outcomes are that:

- people acting for or connected with LAAT understand what is prohibited and how to seek advice;
- bribery and corruption risks are identified, owned, mitigated and reviewed;
- high-risk decisions are supported by proportionate due diligence, segregation of duties and documented approvals;
- concerns can be raised safely and independently and are handled promptly, fairly and confidentially;
- material incidents are reported to the Board, regulators, funding bodies, law-enforcement agencies and Plymouth Marjon University where required; and
- LAAT can demonstrate that this policy operates in practice through training, registers, case records, testing, audit and improvement.

## 2. Legal, regulatory, constitutional and partnership context

This policy must be read and applied consistently with the following requirements, as amended or replaced from time to time:

- the Bribery Act 2010, including the offences of bribing another person, being bribed, bribing a foreign public official and a commercial organisation's failure to prevent bribery by an associated person;
- the Ministry of Justice guidance on procedures that relevant commercial organisations can put in place to prevent bribery, built around proportionality, top-level commitment, risk assessment, due diligence, communication and training, and monitoring and review;
- the Fraud Act 2006, Theft Act 1968, common-law conspiracy to defraud and other relevant economic-crime legislation;
- the Economic Crime and Corporate Transparency Act 2023, including the corporate offence of failure to prevent fraud where LAAT is in scope, and the associated prevention principles as good practice in any event;
- the Employment Rights Act 1996 and Public Interest Disclosure Act 1998 protections for qualifying whistleblowing disclosures;
- the UK General Data Protection Regulation, Data Protection Act 2018, Equality Act 2010 and applicable employment, contract, company, tax and procurement law;
- LAAT's Articles of Association, Management and Governance Framework, Scheme of Delegation, Financial Regulations and Board-reserved matters;
- the Office for Students regulatory framework, including public interest governance, Conditions E1, E2 and E3 after registration, initial Conditions E8 and E9, Condition F3 and current reportable-events guidance; and
- LAAT's agreement and operational arrangements with Plymouth Marjon University, including any notification, cooperation, audit, student-protection and academic-integrity requirements.

This policy applies across all LAAT higher education and related activity, including courses delivered with or for another provider. Where a course is validated, awarded, funded or monitored through a partner, LAAT remains responsible for its own conduct, controls, reporting and cooperation obligations.

## 3. Scope and application

This policy applies to all persons acting for, on behalf of, under the direction of, or in connection with LAAT, whether paid or unpaid and whether located in the United Kingdom or overseas. This includes:

- Governors, committee members, shareholders when acting in relation to LAAT, the Accountable Officer, the CFOO, the Dean and all other officers and employees;
- workers, agency workers, visiting and associate lecturers, secondees, interns, volunteers and former workers in relation to matters arising during their engagement;
- consultants, contractors, suppliers, professional advisers, recruitment agents, marketing agents, introducers, placement providers and other intermediaries;
- partner institutions, subcontractors and persons delivering or supporting LAAT provision under an agreement;
- students when acting as representatives, ambassadors, employees, contractors or in any role involving LAAT resources, decisions or external relationships; and
- any associated person whose conduct could create legal, financial, regulatory or reputational risk for LAAT.

The policy covers conduct connected with admissions, recruitment, student finance, attendance and engagement reporting, assessment, academic awards, quality assurance, procurement, employment, payroll, expenses, contracts, partnerships, sponsorship, donations, gifts, hospitality, placements, research, overseas activity, data returns and all use of institutional or public funds.

Individual students who offer or accept an improper advantage in relation to admission, assessment, attendance, progression, award, representation or any LAAT decision may be investigated under this policy and the relevant student disciplinary, academic integrity or partner procedure.

## 4. Definitions

| Term | Meaning for this policy |
|---|---|
| **Advantage** | Money, a gift, hospitality, loan, fee, reward, discount, service, favour, employment, internship, admission, assessment outcome, contract, confidential information or any other financial or non-financial benefit. |
| **Associated person** | A person who performs services for or on behalf of LAAT. The legal test is fact-specific and may include employees, agents, contractors, subsidiaries, partners and intermediaries. |
| **Bribery** | Offering, promising, giving, requesting, agreeing to receive or accepting an advantage with the intention of inducing or rewarding improper performance, or where acceptance itself is improper. |
| **Corruption** | The misuse of entrusted power, office, influence, information or resources for private, organisational or third-party benefit. |
| **Facilitation payment** | A payment or benefit intended to secure or speed up a routine action to which the payer is already entitled. Such payments are prohibited. |
| **Foreign public official** | A person holding legislative, administrative or judicial office outside the UK, exercising a public function for another country or public agency, or an official or agent of a public international organisation. |
| **Improper performance** | Performance that breaches an expectation of good faith, impartiality, trust, professional duty, contractual duty or lawful decision-making. |
| **Kickback** | The return of part of a payment, commission or benefit as a reward for facilitating a transaction or decision. |

| Term | Meaning for this policy |
|---|---|
| **Public funds** | Includes sums obtained directly or indirectly from public authorities, including student-support payments and funds passed through another provider in connection with students taught by LAAT. |
| **Third party** | Any person or organisation outside LAAT with whom LAAT conducts or proposes to conduct activity, including agents, suppliers, consultants, partners and intermediaries. |

## 5. Policy statement and core principles

No person covered by this policy may, directly or indirectly:

- offer, promise, give, request, agree to receive or accept a bribe or improper advantage;
- use another person, organisation, personal account, invoice, donation, sponsorship, discount, commission or reimbursement to conceal an improper payment or benefit;
- make or authorise a facilitation payment or kickback;
- provide any advantage to a foreign public official to influence that official in their official capacity and obtain or retain business or an advantage;
- falsify, omit, misdescribe or conceal records, approvals, student data, attendance, eligibility, invoices, expenses, gifts, hospitality, conflicts, commissions or payments;
- retaliate against, disadvantage, threaten or victimise a person who raises a concern or assists an investigation in good faith; or
- ignore credible warning signs, obstruct an investigation, destroy evidence or fail to take required action to stop suspected misconduct.

LAAT applies the following prevention principles:

| Principle | LAAT application |
|---|---|
| Proportionate procedures | Controls must match LAAT's size, operating model, partnerships, funding flows, geographical activity and identified risk. |
| Top-level commitment | The Board, ARFC, Accountable Officer and ELT must communicate and demonstrate that improper influence is unacceptable. |
| Risk assessment | Bribery and corruption risks must be identified, documented, scored, owned, mitigated and reviewed at least annually and after material change. |
| Due diligence | Third parties, transactions, appointments and high-risk relationships must be checked before commitment and monitored afterwards. |
| Communication and training | The policy, reporting routes and role-specific controls must be understood and evidenced through compulsory training and accessible guidance. |
| Monitoring and review | Registers, exceptions, incidents, audits and control tests must be reviewed and used to improve the arrangements. |
| Fairness and independence | Decisions and investigations must be impartial, conflict-free, evidence-based and respectful of the rights of all persons involved. |

## 6. Governance, independence and responsibilities

| Role | Responsibilities |
|---|---|
| Board of Governors | Sets the tone from the top; approves the policy; retains ultimate accountability; ensures sufficient resources, expertise and independent assurance; receives annual assurance and immediate reports on material, reserved or reportable matters; and approves any settlement, disclosure or action reserved to the Board. |

| Role | Responsibilities |
|---|---|
| Audit, Risk and Finance Committee (ARFC) | Scrutinises the risk assessment and policy; monitors gifts, conflicts, incidents, investigation quality, audit findings and overdue actions; challenges management assurance; recommends approval and material changes; and escalates significant concerns to the Board. |
| Accountable Officer | Holds executive accountability; ensures the governing body is informed; determines or confirms OfS and other regulatory reporting with Governance and Compliance and legal advice; ensures cross-institutional cooperation; and acts as alternate case owner where the CFOO is conflicted. |
| Chief Finance and Operations Officer (CFOO) | Is the policy owner and operational lead for anti-bribery arrangements; maintains proportionate prevention procedures; ensures financial and procurement controls; commissions risk assessments and investigations; ensures action and recovery; reports to ARFC and the Board; and must declare and withdraw from any conflicted matter. |
| Dean | Ensures controls in admissions, assessment, academic integrity, student conduct, programme delivery, partnerships and academic decision-making; escalates suspected improper influence; and coordinates with Plymouth Marjon University where academic or student matters are affected. |
| Governance and Compliance Manager / designated Governance Officer | Acts as policy custodian; maintains the case and regulatory-decision logs; advises on governance routing, conflicts, Board and ARFC reporting, records and OfS reportable-event assessment; and supports independent investigation and action tracking. |
| Finance Manager / Finance function | Maintains the gifts and hospitality register and relevant financial records; conducts or verifies financial due diligence and reconciliations; identifies unusual payments and control exceptions; preserves audit trails; and escalates concerns to the CFOO and Governance and Compliance. |
| HR Manager / HR function | Ensures induction, training, employment screening and disciplinary processes; supports staff investigations; protects reporters and witnesses from retaliation; and records completion and actions. |
| ELT | Ensures resourcing, operational coordination and visible leadership. Identifiable case information is restricted to members with a defined need-to-know role. |
| SMT | Coordinates implementation, training, systems and controls across functions and receives anonymised thematic assurance. LAAT does not operate an SLT. |
| Managers and budget holders | Apply delegated authority, segregation of duties, declarations and due diligence; challenge unusual requests; prevent unapproved commitments; and report concerns promptly. |
| All persons within scope | Comply with the policy, complete required training, declare gifts and conflicts, keep accurate records, seek advice when uncertain, cooperate with checks and investigations, and report suspected misconduct. |

**Conflict-sensitive routing**
A concern about the CFOO must be routed to the Accountable Officer, Governance and Compliance or the Whistleblowing Guardian. A concern about the Accountable Officer must be routed to the Chair of the Board, the Chair of ARFC or the Whistleblowing Guardian. A concern about a Governor or the Chair must be routed to an unconflicted Independent Governor, normally the Senior Independent Governor or Chair of ARFC. No person may select, direct or receive the investigation of an allegation concerning themselves or a close associate.

## 7. Bribery and corruption risk assessment

The CFOO, supported by Governance and Compliance and relevant control owners, must maintain a documented bribery and corruption risk assessment integrated with LAAT’s institutional risk register. It must be reviewed at least annually, after any material incident and before material changes to provision, partnerships, geography, funding, ownership, agents or systems.

The assessment must consider, as relevant:

- recruitment agents, introducers, commission structures, sub-agents and overseas activity;
- admissions, English-language evidence, student eligibility, attendance and engagement, withdrawals and student-finance data;
- procurement, tendering, supplier creation, bank-detail changes, invoices, payroll, expenses and cash or personal-account requests;
- partnerships, subcontracting, validation, placements and funds passed directly or indirectly between providers;
- conflicts, related parties, shareholder or Governor interests, family connections and transactions that benefit staff or connected persons;
- gifts, hospitality, sponsorship, donations, employment opportunities and other non-cash benefits;
- assessment, academic decisions, quality assurance, complaints, appeals and award-related decisions;
- cyber-enabled payment diversion, impersonation, invoice fraud and unauthorised system access; and
- countries, sectors, transactions or counterparties presenting increased legal, corruption, sanctions, secrecy or reputational risk.

Each material risk must have an owner, existing controls, residual risk score, further action, target date, assurance source and escalation threshold. Weaknesses must not be described as controlled merely because a policy exists; LAAT must evidence the operation and testing of controls.

## 8. Prohibited conduct and required controls

### 8.1 Gifts and hospitality

Gifts and hospitality must never influence, or reasonably appear to influence, a decision. They must be modest, infrequent, transparent, for a legitimate institutional purpose and permitted by law and LAAT's Gifts and Hospitality arrangements.

- Cash, cash equivalents, personal loans, gift cards capable of cash conversion, secret commissions and personal rebates must never be accepted or offered.
- No gift or hospitality may be offered, accepted or retained during a live procurement, contract award, recruitment, admissions, assessment, appeal, complaint, disciplinary or regulatory decision where it could affect, or appear to affect, impartiality.
- Any gift or hospitality worth more than £50, any repeated offer, any offer from an applicant, student, agent, supplier or decision beneficiary, and any offer that causes concern must be declared to the Finance function, whether accepted or refused.
- Offers must not be split, understated or channelled through another person to avoid a threshold or register.
- Where prior approval is required but genuinely impracticable, the matter must be declared promptly and no later than five working days after the event, with reasons.
- The Finance function must maintain a complete register showing the offeror, recipient, date, purpose, value, decision, approver, related transaction and any action.

### 8.2 Facilitation payments, extortion and personal safety

Facilitation payments and kickbacks are prohibited, regardless of local custom or the value involved. Where a person reasonably believes that refusal would create an immediate threat to life, physical safety or unlawful detention, personal safety takes priority. The person must report the incident as soon as safely possible, record the exact circumstances and cooperate with legal and control review. This is not an approval of the payment or a general exception.

### 8.3 Procurement, contracts and financial transactions

- No individual may initiate, verify, approve, record and release the same transaction or control an end-to-end process that creates an unreviewed opportunity for improper influence.
- Supplier creation and bank-detail changes must be independently verified using trusted contact information. The verifier must not rely only on contact details supplied in the change request.
- Procurement must use fair, transparent and documented procedures, with declared conflicts, objective criteria, appropriate competition or a recorded exception, and approval under the Scheme of Delegation.
- Invoices must accurately describe genuine goods or services and be supported by evidence of receipt, contract terms, correct coding and an independent approval.
- Payments to personal accounts, unexplained third parties, cash, anonymous instruments, offshore accounts unrelated to the contract, or accounts in a different name or jurisdiction are prohibited unless exceptional legality, business need, enhanced due diligence and approval are documented by the CFOO and, where material, ARFC or the Board.
- Contractors and suppliers must not provide personal benefits to LAAT staff, Governors, students or connected persons in return for business or favourable treatment.

### 8.4 Recruitment, admissions, student finance and academic decisions

- Admissions, recognition of prior learning, fee status, scholarships, attendance, continuation, withdrawal, completion, assessment, appeals and awards must be decided only through approved criteria and authorised processes.
- No applicant, student, agent, sponsor, employer or other person may offer or provide money, gifts, services, employment, commissions or favours to influence admission, attendance recording, assessment, progression, complaints, appeals or awards.
- Recruitment and admissions staff must remain independent from agent commission decisions. Commission must not depend on a staff member overriding academic, English-language, identity, eligibility or genuine-student requirements.
- Data used for Student Loans Company, OfS, partner, statutory or funding purposes must be accurate, complete, timely, traceable and independently checked. Known errors must be corrected and escalated promptly.
- Changes in registration, attendance, engagement, interruption, withdrawal or completion must not be delayed, suppressed or manipulated to retain income or improve reported performance.
- Where improper influence may affect an academic or student decision, the Dean and Governance and Compliance must ensure an independent review and partner notification where required.

### 8.5 Third parties, agents and partnerships

Before appointment or renewal, LAAT must conduct risk-based due diligence proportionate to the role, country, payment, authority, access to students or funds and identified warning signs. High-risk relationships require enhanced due diligence and explicit CFOO approval.

- identity, legal status, ownership, controllers, directors and relevant connected persons;
- competence, qualifications, reputation, regulatory history, litigation, debarment, sanctions and adverse information;
- business rationale, scope, deliverables, fees, commission, payment destination and whether remuneration is reasonable and transparent;
- conflicts, referrals, family or personal connections to LAAT staff, Governors, students or decision-makers;
- use of sub-agents, subcontractors or introducers and the controls applied to them;
- written anti-bribery obligations, accurate books and records, audit and information rights, training where appropriate, notification duties and termination or suspension rights; and
- ongoing monitoring, periodic renewal, transaction testing and action where performance or risk changes.

Recruitment agents must not hold or route student tuition fees or public funds unless expressly authorised by a lawful, controlled and Board-approved arrangement. They must not use sub-agents without LAAT's written consent, guarantee admission or funding, coach applicants to misrepresent information, or offer students or decision-makers improper benefits.

### 8.6 Donations, sponsorship, political activity and employment opportunities

- LAAT does not make political donations. Staff and Governors may engage in lawful personal political activity only in a private capacity, without using LAAT funds, resources, name or influence improperly.
- Charitable donations and sponsorship must support a legitimate institutional purpose, be documented, due-diligenced, approved under delegated authority and not be used to influence a decision or benefit a decision-maker or connected person.
- Employment, consultancy, internships, placements, scholarships and other opportunities must not be offered or accepted as an inducement or reward. Appointments must follow approved, fair and documented processes.
- Requests for support connected to a public official, supplier, agent, partner, applicant or other decision-maker require enhanced scrutiny and written approval.

### 8.7 Conflicts of interest and related parties

All actual, potential and perceived conflicts must be declared promptly and managed under LAAT's Conflicts of Interest Policy and registers. A conflicted person must not receive papers, participate in discussion, influence others or vote unless the authorised chair has documented a lawful and proportionate management arrangement. Related-party transactions must be on demonstrably arm's-length terms, independently approved and transparently reported.

## 9. Reporting routes and immediate action

A person should report any suspicion, request, offer, warning sign, control override, unusual payment or attempted improper influence promptly. Proof is not required. Reports may be made orally or in writing and may be anonymous, although anonymity can limit investigation and feedback.

| Situation | Route |
|---|---|
| Normal route | CFOO or Governance and Compliance Manager / designated Governance Officer. |
| Financial or procurement concern | Finance Manager, CFOO or Governance and Compliance. |
| Academic, admissions or student concern | Dean and Governance and Compliance, unless either is implicated. |
| Concern about the CFOO | Accountable Officer, Chair of ARFC or Whistleblowing Guardian. |
| Concern about the Accountable Officer | Chair of the Board, Chair of ARFC or Whistleblowing Guardian. |
| Concern about a Governor or Board Chair | Senior Independent Governor, Chair of ARFC or another unconflicted Independent Governor. |
| Whistleblowing route | LAAT Whistleblowing and Speak-Up Policy, including the independent Whistleblowing Guardian. |
| Emergency | Call emergency services where there is immediate danger. Preserve safety and evidence and inform an appropriate LAAT route as soon as possible. |

Reports should include, where known, the people and organisations involved, dates, locations, transaction or decision, amount or benefit, supporting records, immediate risks, witnesses and any action already taken. Reporters must not investigate personally, confront a suspected person, access records without authority or alert others in a way that could compromise evidence.

## 10. Assessment, investigation and outcomes

All reports must be logged securely and assessed by an unconflicted authorised person. The assessment must consider safety, evidence preservation, legal privilege, regulatory deadlines, student and public-funds risk, conflicts, safeguarding, data protection, interim controls and whether another procedure should operate alongside this policy.

A formal investigation must:

- have written terms of reference, scope, investigator, decision-maker, reporting line and conflict checks;
- be proportionate, independent and conducted by a person with appropriate expertise and authority;
- preserve original evidence, audit trails, devices, emails, financial records, registers, system logs and relevant student or partner records;
- give affected persons a fair opportunity to respond, subject to lawful restrictions and the need to protect evidence and others;
- maintain confidentiality on a need-to-know basis and record all material decisions, findings and limitations;
- distinguish facts, allegations, evidence, findings, control failures, legal advice and recommendations; and
- produce an outcome approved by an unconflicted person or body under the Scheme of Delegation.

Possible outcomes include no further action, referral to another process, disciplinary or student conduct action, contract suspension or termination, recovery of funds, control redesign, training, audit, partner action, regulatory notification, law-enforcement referral and Board action. A finding under an internal process is made on the applicable civil or policy standard and does not determine criminal liability.

Where a concern is not substantiated, LAAT must still consider whether the report identified a control weakness, training need, poor practice, unclear process or risk that should be addressed. Deliberately false or malicious allegations may be dealt with under relevant procedures, but an honest report that is not substantiated must not lead to detriment.

## 11. External and regulatory reporting

The Accountable Officer, supported by Governance and Compliance, the CFOO and legal advice where appropriate, must assess without delay whether a matter requires notification or cooperation with an external body. This may include:

- police, the Serious Fraud Office, National Crime Agency or another law-enforcement or prosecuting authority;
- the Office for Students, including a reportable event under the current guidance and Condition F3 after registration;
- Student Loans Company, Department for Education, UK Research and Innovation, local authority or another public funder;
- Plymouth Marjon University and any other awarding, validating, lead or delivery partner affected by the matter;
- external or internal auditors, insurers, banks, professional regulators, tax authorities or contractual counterparties; and
- data-protection, safeguarding, immigration, health and safety or other regulators where the facts engage their remit.

Where LAAT is registered with the OfS, reportable events must be submitted within the period specified by the current OfS requirement, ordinarily within five working days of identification unless exceptional circumstances apply. The governing body retains responsibility for OfS interactions and must be informed in accordance with the Scheme of Delegation.

External reporting must not be delayed for reputational reasons or until every fact is known. Equally, disclosures must be accurate, appropriately authorised, protected by confidentiality and legal privilege where applicable, and updated when material facts change.

## 12. Protection, confidentiality, data and records

LAAT will not tolerate retaliation, victimisation, dismissal, disadvantage, intimidation or adverse treatment against a person who raises a concern or assists an investigation in good faith. Managers and HR must identify and address any risk of detriment. Statutory whistleblowing protections apply where the legal tests are met, but LAAT's policy protection is not limited to legally protected disclosures.

Confidentiality will be maintained as far as lawfully and practically possible. The identity of a reporter or witness will be shared only where necessary for assessment, investigation, fairness, legal duty or protection. Absolute confidentiality or a particular outcome cannot be guaranteed. Anonymous reports will be assessed on their content and available evidence.

Personal data must be processed lawfully, fairly, securely and only for legitimate purposes. Access must be role-based and recorded. Case records, investigation material, legal advice, gifts and hospitality records, due-diligence evidence and regulatory decisions must be retained in accordance with LAAT's Records Retention Schedule, legal holds and applicable law. Material case and control records should ordinarily be retained for at least six years after closure unless a longer or shorter period is justified and documented.

No person may delete, alter, conceal or destroy relevant information once a concern, investigation, dispute, audit or regulatory matter is known or reasonably anticipated.

## 13. Training, communication and culture

Training is compulsory and must be proportionate to role and risk. LAAT must provide:

- anti-bribery and speak-up training at induction for all staff, Governors and relevant workers;
- at least annual refresher training or attestation for Governors, ELT, SMT and staff in finance, procurement, admissions, recruitment, student finance, data, partnerships, HR and other high-risk roles;
- role-specific scenarios covering agents, gifts, conflicts, procurement, student data, public funds, academic decisions and cyber-enabled payment fraud;
- briefing and contractual communication for relevant agents, suppliers, contractors and partners;
- completion records, reminders, escalation for non-completion and effectiveness checks such as knowledge tests, control sampling or case exercises; and
- visible communication from the Board, Accountable Officer and CFOO that performance targets, recruitment, income or relationships never justify improper conduct or concealment.

People must seek advice before acting where they are unsure. Asking for advice or refusing a suspicious request will not be treated as poor performance.

## 14. Monitoring, assurance and review

The CFOO and Governance and Compliance must maintain an evidence base showing implementation and effectiveness. At minimum, monitoring must cover:

- completion and effectiveness of training;
- bribery and corruption risk-register entries, overdue actions and changes in residual risk;
- gifts, hospitality and conflict declarations, approvals, refusals and trends;
- third-party due diligence, high-risk approvals, contract clauses and monitoring;
- incidents, attempted incidents, anonymous reports, investigation timeliness, findings, recovery and action closure;
- financial, procurement, student-data and public-funds control exceptions and reconciliations;
- audit findings, repeat issues, management overrides and overdue recommendations; and
- partner, regulator, insurer, law-enforcement or litigation developments.

Material incidents must be reported immediately through the governance structure. ARFC must receive at least quarterly anonymised or appropriately confidential assurance, including exceptions and overdue actions. The Board must receive an annual assurance report and any immediate report required by reserved matters, regulatory duties or material risk.

The policy must be reviewed annually and sooner following legal or OfS change, a material incident, audit finding, new campus, partnership, agent, funding route, ownership change or significant control weakness. Material changes require ARFC recommendation and Board approval. The CFOO may issue non-material operating guidance consistent with this policy and the Scheme of Delegation, with changes reported to ARFC.

## 15. Breaches, sanctions, recovery and learning

A breach may result in disciplinary action up to and including dismissal, student disciplinary or academic action, removal from office or committee, contract suspension or termination, disqualification from procurement, recovery of funds or benefits, civil action, referral to a regulator or partner, and criminal investigation or prosecution.

LAAT will seek to stop ongoing harm, protect students and public funds, recover losses where appropriate, correct inaccurate data or claims, notify affected bodies, review connected decisions and prevent recurrence. Sanctions and remediation must be proportionate, consistent, independently authorised and documented.

No settlement, confidentiality clause, resignation, refund or commercial arrangement may be used to conceal bribery, prevent lawful reporting, obstruct a regulator or suppress relevant evidence. Legal advice must be obtained for any settlement connected with suspected bribery or corruption.

## Appendix A. Operating procedure and target timescales

| Stage | Required action | Target |
|---|---|---|
| 1. Receive and protect | Record the concern securely; address immediate safety; preserve evidence; restrict access; avoid tipping-off. | Same working day where urgent. |
| 2. Acknowledge | Confirm receipt where contact details are available; explain next steps, confidentiality and support. | Normally within 5 working days. |
| 3. Conflict and route check | Identify implicated persons; appoint an unconflicted case owner; decide whether whistleblowing, disciplinary, student, safeguarding, partner or other procedures also apply. | Normally within 5 working days. |
| 4. Initial risk assessment | Assess materiality, public funds, students, ongoing conduct, evidence, legal privilege, regulatory deadlines, partner impact and interim controls. | Normally within 10 working days; immediately for urgent cases. |
| 5. Investigation plan | Set scope, investigator, decision-maker, evidence sources, interview plan, communications and target date. | Normally within 15 working days where formal investigation is required. |
| 6. Investigation and updates | Gather and test evidence; provide fair opportunity to respond; update the reporter where appropriate. | Updates normally at least every 20 working days. |
| 7. Decision and action | Approve findings under delegated authority; stop conduct; implement sanctions, recovery, control improvements and reporting. | Promptly after the investigation report. |
| 8. Closure and learning | Record outcomes, evidence, notifications, actions, owners and dates; update risks and training; provide appropriate closure feedback. | Closure only when actions are assigned and regulatory decisions recorded. |
| 9. Assurance follow-up | Verify completion and effectiveness of actions; report overdue or ineffective remediation. | At agreed intervals and until independently closed. |

Targets are service standards, not rigid deadlines. They may be adjusted for complexity, legal advice, absence, parallel criminal or regulatory action, or protection of individuals. Reasons for material delay and revised dates must be recorded and reported through the case governance structure.

## Appendix B. Bribery and corruption concern report form

| Field | Information |
|---|---|
| Reporter name | Optional if reporting anonymously |
| Role / relationship to LAAT | |
| Contact details and safe contact method | |
| Date concern raised | |
| People / organisations involved | |
| Description of concern | Include dates, decisions, payments, benefits, statements and how you became aware |
| Immediate risk | Students, public funds, safety, evidence, ongoing payments or decisions |
| Supporting evidence | List or attach; do not obtain evidence without authority |
| Other reporting already made | Manager, partner, regulator, police or other body |
| Confidentiality or support needs | |
| Consent / acknowledgement | LAAT will process information for assessment, investigation, legal and regulatory purposes |

## Appendix C. Gifts and hospitality declaration form

| Field | Information |
|---|---|
| Name, role and function | |
| Date offered / received | |
| Offered by / to | Name, organisation and relationship to LAAT |
| Description | Gift, meal, travel, event, accommodation, discount or other benefit |
| Estimated value | State basis if estimated or unknown |
| Related decision or transaction | Procurement, admissions, assessment, partnership, recruitment, funding or other |
| Accepted, declined or returned | Include date and reason |
| Prior approval | Approver, date and conditions |
| Conflict declared | Reference to conflict register where applicable |
| Finance register entry | Reference number and date |
| Further action | Return, donation, refusal, monitoring or escalation |

## Appendix D. Third-party anti-bribery due diligence checklist

| Control | Evidence / question | Complete | Owner / reference |
|---|---|---|---|
| Identity and ownership | Legal name, registration, address, directors, owners, controllers and bank-account holder verified. | Yes / No / N/A | |
| Business rationale | Need for appointment and services clearly documented; alternatives and procurement route recorded. | Yes / No / N/A | |
| Competence and reputation | Qualifications, references, experience, adverse media, litigation, regulatory history and debarment checked proportionately. | Yes / No / N/A | |
| Connections and conflicts | Links to LAAT staff, Governors, shareholders, students, public officials, partner staff or decision-makers declared and managed. | Yes / No / N/A | |
| Geography and sector | Country, local corruption risk, public-official interaction, sanctions and secrecy risks assessed. | Yes / No / N/A | |
| Fees and payment | Commission or fee is proportionate, benchmarked, transparent and payable only to a verified account in the contracting party’s name. | Yes / No / N/A | |
| Sub-agents | Need, identity, approval, contract and monitoring of any sub-agent or subcontractor established. | Yes / No / N/A | |
| Student and public-funds controls | No unauthorised handling of tuition fees or public funds; no guarantees or misrepresentation; data and attendance responsibilities defined. | Yes / No / N/A | |
| Contract protections | Anti-bribery compliance, accurate records, information and audit rights, training where required, notification, suspension, recovery and termination clauses included. | Yes / No / N/A | |
| Approval | Risk rating, enhanced due diligence, approver, conditions and review date recorded before commitment. | Yes / No / N/A | |
| Ongoing monitoring | Performance, invoices, complaints, gifts, data quality, sub-agents and changes in ownership or risk reviewed. | Yes / No / N/A | |

### Illustrative warning signs requiring escalation

- unexplained urgency, secrecy, cash, personal-account or third-country payment requests;
- fees or commissions significantly above market or unrelated to clear deliverables;
- refusal to identify owners, sub-agents, bank details, references or contractual responsibilities;
- requests to backdate, split, misdescribe or omit invoices, contracts, student records, approvals or gifts;
- personal or family connection to a decision-maker, public official, staff member, Governor or shareholder;
- guarantees of admission, grades, attendance, student funding, visas, procurement success or regulatory outcomes;
- pressure to bypass due diligence, competition, segregation, academic criteria, eligibility checks or data validation;
- unusual hospitality, employment, placement, donation, sponsorship or scholarship connected to a pending decision;
- payments without evidence of service, repeated round-sum invoices, duplicate bank accounts or unexplained credit notes; and
- adverse information, regulatory action, unexplained corporate changes or reluctance to accept anti-bribery clauses.

## Appendix E. Annual assurance schedule

| Assurance area | Minimum evidence | Status / action |
|---|---|---|
| Risk assessment | Annual and event-driven risk assessment completed; material risks, owners, actions and residual ratings approved. | |
| Governance | Board and ARFC minutes evidence scrutiny, challenge, reserved decisions and action tracking. | |
| Training | Completion by role, overdue cases, knowledge testing and high-risk refresher effectiveness. | |
| Gifts and hospitality | Register completeness, values, refusals, related decisions, repeats and exceptions. | |
| Conflicts and related parties | Annual and event-driven declarations; management plans; transactions and recusals tested. | |
| Third parties | Due diligence coverage, high-risk approvals, contracts, sub-agents, commissions and monitoring. | |
| Financial and procurement controls | Segregation, supplier changes, payment release, tender exceptions, personal accounts, reconciliations and overrides. | |
| Student and public-funds controls | Recruitment, eligibility, attendance, withdrawals, data submissions, funding reconciliations and corrections. | |
| Cases | Reports, attempted incidents, acknowledgement, triage, investigation, findings, action, recovery, repeat themes and closure. | |
| External reporting | OfS, partner, funder, auditor, insurer and law-enforcement assessments and notifications recorded. | |
| Audit and testing | Internal audit / independent review findings, management responses, overdue actions and effectiveness checks. | |
| Annual conclusion | CFOO and Accountable Officer assurance, ARFC recommendation and Board conclusion, including exceptions and planned improvement. | |

## Appendix F. Related LAAT documents and official references

| Document group | Documents |
|---|---|
| Constitutional and governance | Articles of Association; Management and Governance Framework; Scheme of Delegation; Board and ARFC Terms of Reference; Risk Management Policy and Framework. |
| Finance and public funds | Financial Regulations; Fraud and Public Funds arrangements; Procurement Policy and procedures; Value for Money Statement and Framework; reserves, financial planning, data reconciliation and audit arrangements. |
| Integrity and reporting | Whistleblowing and Speak-Up Policy; Conflicts of Interest Policy and Register; Gifts and Hospitality Policy and Register; Staff and Student Codes of Conduct; disciplinary arrangements. |
| Academic, student and partnership | Admissions Policy; Academic Regulations; Academic Integrity Policy; student complaints and appeals; partnership agreement and operational schedules with Plymouth Marjon University; student finance, attendance and data procedures. |
| Information and records | Data Protection Policy; Records Retention Schedule; Cyber and Information Security arrangements; legal hold and investigation guidance. |

### Official references checked for this revision

| Source | Reference |
|---|---|
| Office for Students | Conditions of registration and current guidance for E1, E2, E3, initial E8 and E9, F3 and Regulatory Advice 16 on reportable events. |
| UK Government / Ministry of Justice | Bribery Act 2010 guidance on adequate procedures and its six prevention principles. |
| UK Government / Home Office | Economic Crime and Corporate Transparency Act 2023 guidance on the offence of failure to prevent fraud, effective from 1 September 2025. |
| Legislation | Bribery Act 2010; Fraud Act 2006; Theft Act 1968; Economic Crime and Corporate Transparency Act 2023; Employment Rights Act 1996; Public Interest Disclosure Act 1998; Data Protection Act 2018 and UK GDPR. |

Regulatory and legal references were checked on 29 June 2026. Governance and Compliance must verify current law, OfS requirements and official guidance at every review and before any material external notification or policy amendment.

## Document approval record

| Approval / confirmation | Role | Signature | Date |
|---|---|---|---|
| Policy owner | Chief Finance and Operations Officer (CFOO) | Raghav Malhotra | |
| Executive accountability | Accountable Officer | Stephen Plant | |
| Policy custodian | Governance and Compliance Manager / designated Governance Officer | Agrima Shankar | |
| ARFC recommendation | Chair, Audit, Risk and Finance Committee | Alan Fenton | |
| Board approval | Chair, Board of Governors | Sarah McAdam | To be approved |