

ANTI-BRIBERY, FRAUD AND CORRUPTION POLICY

Version	3.0
Effective date	August 2025
Date for review	August 2026
Policy owner	Chief Executive
Reference points	<p>Bribery Act 2010 UK Government Guidance (Section 9)</p> <p>Fraud Act 2006</p> <p>Transparency International Corruption Perceptions Index</p> <p>Office for Students Guidance on Preventing Fraud in Higher Education</p> <p>UK Quality Code for Higher Education Governance & Integrity</p>
Audience/handling notes	Governance, Staff, Students, External
Dissemination and implementation plan	<p>This policy is published on the NHAM website, in the Staff and Student Handbooks, and covered in induction for all staff.</p> <p>Annual refresher training is provided for staff in higher-risk roles.</p> <p>The Chief Executive, supported by the Governance Committee, is responsible for oversight and compliance.</p>
Linked Policies, Procedures and Forms	<p>Modern Slavery Statement; Staff Code of Conduct; Student Code of Conduct; Staff Handbook; Student Handbook; Staff and Student Disciplinary Procedures; IT Acceptable Use Policy.</p>
Date approved	August 2025

1 Introduction

The Notting Hill Academy of Music (NHAM) is committed to the highest standards of integrity, transparency, and accountability in all operations.

We have zero tolerance for bribery, fraud, or corruption, whether committed by staff, students, or third parties acting on our behalf.

- This policy sets out:
- What constitutes bribery, fraud, and corruption in the NHAM context.
- Our preventative measures in line with the Bribery Act 2010 and sector best practice.
- How to report concerns and what protection is in place for those raising them in good faith.

2 Definitions

Bribery: Offering, giving, receiving, or soliciting something of value to influence the actions of someone in a position of trust.



Fraud: Dishonest behaviour intended to secure an unfair or unlawful gain, or to cause loss to another.

Corruption: Abuse of entrusted power for private gain.

Examples include:

- Gifts or hospitality intended to influence academic or business decisions.
- Payments to secure a contract, admission, grade, or visa.
- Manipulation of research results or assessment outcomes for advantage.
- False expense claims or falsification of records.

3 Scope

This policy applies to:

- All staff (permanent, temporary, agency, and contractors).
- Students, volunteers, interns, and work placement participants.
- Associated persons: agents, suppliers, consultants, business partners, and joint venture partners acting for or on behalf of NHAM.

4 Examples of Prohibited Conduct

- Offering or accepting cash, gifts, or hospitality to influence decisions.
- Fabricating academic results in exchange for a benefit.
- Awarding contracts without fair procurement processes.
- Accepting “kickbacks” for facilitating admissions or recruitment.
- Making “facilitation payments” to speed up routine processes.

5 Legal & Regulatory Context

Under the Bribery Act 2010, it is an offence to:

- Offer, promise, or give a bribe.
- Request, agree to receive, or accept a bribe.
- Bribe a foreign public official.
- Fail to prevent bribery by someone associated with your organisation.

Conviction can result in:

- Up to 10 years’ imprisonment.
- Unlimited fines.
- Permanent reputational damage.

6 Areas of risk

Particular risk areas in Higher Education include:

- Procurement and tender processes.
- Contract negotiations.



- Recruitment, admissions, and awarding of scholarships.
- Academic assessment and marking.
- Overseas travel and international partnerships.
- Donations and sponsorships.
- Awarding of professional opportunities (internships, placements).

7 Prevention

NHAM has adopted the six principles of the Ministry of Justice's Adequate Procedures Guidance:

1. Proportionate procedures, policies and processes tailored to our risks.
2. Top-level commitment from senior leadership active in prevention and enforcement.
3. Risk assessment regular review of bribery/fraud risks in operations.
4. Due diligence checks on partners, suppliers, and contractors.
5. Communication & training awareness raising for all staff and students.
6. Monitoring & review: annual review by the Governance Committee.

8 Reporting concerns

If you suspect bribery, fraud, or corruption:

- Raise the matter with your line manager or the Chief Executive.
- Use the NHAM Whistleblowing Policy if you require anonymity.
- Report overseas incidents to local authorities where safe to do so.

You will be protected from retaliation if you report a concern in good faith, even if it is not upheld. Malicious or vexatious complaints may result in disciplinary action.

9 Breaches & Sanctions

Breaches of this policy will be investigated and may result in:

- Disciplinary action (up to dismissal or expulsion).
- Referral to law enforcement.
- Civil recovery of losses.

10 Monitoring & Review

The Governance Committee will review:

- Reports of suspected bribery or fraud.
- Effectiveness of prevention measures.
- Changes to relevant law or OfS guidance.

This policy will be reviewed annually, or sooner if required by changes in legislation or risk profile.