



London Academy for Applied Technology (LAAT)

Anti-Bribery and Corruption Policy

Policy Title: Anti-Bribery and Corruption Policy

Document reference: LAAT-GOV-ABC-001

Department / Function: Governance / Finance / HR

Policy Owner: Academic Dean (with Finance Director oversight)

Oversight Committee: Audit, Risk & Finance Committee

Approving Body: Board of Governors (final approval)

Version: v1.0

Status: Adopted

Date approved: 18/02/2026

Review date: Annually from approval date

Supersedes: None

Regulatory Alignment with Office for Students (OfS) Conditions

The Anti-Bribery and Corruption Policy supports the London Academy for Applied Technology's (LAAT) commitment to integrity, transparency, and the responsible use of public and institutional funds. The policy forms a key part of LAAT's governance and risk-management framework and sets out clear expectations for ethical conduct, prevention, and reporting of bribery and corruption.

The policy aligns with **OfS Condition E8 (Initial) – Fraud and Inappropriate Use of Public Funds** by establishing controls, procedures, and assurance mechanisms designed to prevent bribery, corruption, and financial impropriety. It defines prohibited behaviours, reporting requirements, and investigative processes, ensuring that financial and operational decisions are made lawfully and ethically.

The policy also aligns with **OfS Condition E1 (Public Interest Governance) and E2 (Management and Governance)** by supporting governance arrangements that uphold public trust and ensure effective oversight, risk management, and accountability across the institution. Clear roles and responsibilities are defined to ensure that concerns are escalated appropriately and managed consistently.

In addition, the policy supports **OfS Condition E3 (Accountability)** by providing documented procedures for monitoring compliance, recording actions taken, and

reporting to senior management and governance bodies, thereby demonstrating effective institutional control and regulatory compliance.

The policy is informed by relevant sector reference points, including the ***UK Quality Code for Higher Education*** and the ***OIA Good Practice Framework***, and is implemented through LAAT's academic governance and quality assurance arrangements to ensure consistency, fairness and effective oversight.

Terms of Reference

1. Purpose

This Policy sets out the expectations, standards, and controls through which LAAT prevents, identifies, and addresses bribery and corruption in its higher education provision and wider institutional operations.

The purpose of this Policy is to ensure that all LAAT activities are conducted honestly, ethically, and transparently, protecting students, staff, partners, and external stakeholders from improper influence, while safeguarding institutional integrity and compliance with legal and regulatory obligations.

2. Scope

This Policy applies to all individuals acting on behalf of LAAT, regardless of role or contractual status. This includes governors, senior officers, employees, visiting and associate staff, students acting in representative capacities, contractors, agents, consultants, and third parties representing LAAT.

The Policy applies to academic delivery, recruitment, admissions, procurement, financial transactions, partnership arrangements, overseas activity, and commercial operations.

Where any conflict arises between this Policy and Plymouth Marjon University's partner financial or governance regulations, the University's requirements will take precedence.

3. Definitions

Bribery: The offering, promising, giving, requesting, or accepting of an advantage intended to induce improper performance of a function or activity.

Corruption: The misuse of entrusted power or authority for personal or organisational gain.

Improper Advantage: Any financial or non-financial benefit intended to influence a decision unlawfully or unethically.

4. Principles

LAAT is committed to:

- Integrity and ethical conduct
- Transparency in financial and institutional decision-making
- Zero tolerance of bribery and corruption
- Accountability for use of institutional resources
- Confidence to raise concerns without fear of reprisal

5. Governance, Committees and Oversight

The **Board of Governors** holds ultimate responsibility for ensuring LAAT operates with integrity and in compliance with OfS governance expectations.

The **Audit & Risk Committee** has delegated responsibility for oversight of this Policy.

The Committee will:

- Approve and periodically review this Policy
- Monitor bribery and corruption risks and incidents
- Seek assurance on effectiveness of financial controls
- Escalate significant risks to the Board of Governors

6. Policy Statement

6.1 General Standards

LAAT operates a zero-tolerance approach to bribery and corruption. No individual acting on behalf of LAAT may offer, accept, request, or authorise any improper advantage intended to influence academic, financial, or operational decisions.

6.2 Gifts and Hospitality

Gifts and hospitality may only be offered or accepted where legitimate, proportionate, and declared in accordance with LAAT's Gifts and Hospitality procedures.

6.3 Reporting and Protection

LAAT ensures individuals can raise concerns in good faith without fear of victimisation or detriment. Concerns are handled confidentially and proportionately.

7. Standard Operating Procedure (SOP)

7.1 Process Overview

This Standard Operating Procedure (SOP) sets out how London Academy for Applied Technology (LAAT) identifies, prevents, reports, investigates, and resolves bribery and corruption risks. It ensures that concerns are managed consistently, transparently, and proportionately, in accordance with LAAT's governance arrangements, financial regulations, and Office for Students (OfS) expectations for effective institutional management and oversight. The procedure also supports alignment with Plymouth Marjon University's partner governance and financial integrity requirements.

7.2 Step-by-Step Process

Stage 1 – Prevention and Risk Control

- Staff training and awareness on anti-bribery obligations
- Risk-based controls in procurement, finance, and partnership activities
- Due diligence checks on third parties, agents, and suppliers

Stage 2 – Identification

- Declaration of gifts, hospitality, and conflicts of interest
- Monitoring through audits, financial reviews, and management oversight

Stage 3 – Reporting

- Concerns raised via line management, Finance, Governance, or Whistleblowing routes
- Safe reporting without fear of retaliation or detriment

Stage 4 – Initial Triage and Risk Assessment

- Finance / Governance conducts initial review of reported concerns
- Risk assessment undertaken to determine seriousness and next steps

Stage 5 – Formal Investigation

- Proportionate investigation led by authorised senior staff
- External or legal advice sought where appropriate

Stage 6 – Outcome Decision and Corrective Action

- Decisions approved in line with delegated authority
- Disciplinary, contractual, or corrective actions implemented where required

Stage 7 – Record-Keeping and Reporting

- All cases recorded securely in line with UK GDPR
- Anonymised reporting submitted to the Audit & Risk Committee
- Risk register updated to inform ongoing institutional oversight

7.3 Templates and Records

The following standard records support implementation of this SOP:

- Gifts and Hospitality Register
- Conflict of Interest Declaration Forms
- Investigation Report Template
- Risk Register Entries
- Committee Reporting Records

8. Monitoring, Compliance and Review

8.1 Monitoring

Compliance with this Policy is monitored through LAAT's governance and risk management arrangements. Oversight is provided by the Audit & Risk Committee,

supported by internal audit activity, financial controls, and periodic review of the institutional risk register. Monitoring activity ensures that bribery and corruption risks are identified, managed, and reported appropriately.

8.2 Compliance

Failure to comply with this Policy may result in disciplinary action, termination of contract, or other appropriate legal or contractual measures. Any confirmed incidents of bribery or corruption will be addressed promptly and proportionately, with escalation to senior management and the Board of Governors where required.

8.3 Review

This Policy will be reviewed annually, or sooner where required by changes in legislation, Office for Students expectations, validating partner requirements, or emerging institutional risk considerations.

9. Responsible People / Roles include

- **Dean (Policy Owner):** Dr Manoj Ponugubati
Has operational responsibility for implementing, maintaining, and reviewing this Policy and ensuring alignment with OfS and validating-partner expectations.
- **Finance Director:** Mr. Raghav Mathotra
Oversees financial controls, procurement integrity, and record-keeping arrangements that support prevention and detection of bribery and corruption.
- **Audit and Risk Lead:** Mr Nahid Aminul
Provides delegated oversight of bribery and corruption risks, reviews audit findings, and monitors the institutional risk register.
- **Students and External Stakeholders**
May raise concerns regarding suspected unethical or corrupt behaviour without fear of detriment.

List of People and Contacts

Role	Name	Email ID
Dean (Policy Owner)	Dr Manoj Ponugubati	manoj@laat.ac.uk
Chief Finance Officer	Mr Raghav Mathotra	raghav.malhotra@laat.ac.uk
Audit and Risk Lead	Mr Nahid Aminul	Nahid.aminul@laat.ac.uk

10. List of Documents

- Bribery and corruption – concern report form
- Gift and hospitality declaration form
- Conflict of interest declaration form

This Anti-Bribery and Corruption Policy should be read in conjunction with the following LAAT policies

- Financial Regulations
- Gifts and Hospitality Policy & Register
- Conflicts of Interest Policy & Register
- Whistleblowing (Public Interest Disclosure) Policy
- Staff Code of Conduct

11. Evidence

- Bribery and corruption – concern report form
- Gift and hospitality declaration form
- Conflict of interest declaration form
- Financial Regulations
- Gifts and Hospitality Policy & Register
- Conflicts of Interest Policy & Register
- Whistleblowing (Public Interest Disclosure) Policy
- Staff Code of Conduct

Evidence Item	Purpose / What it Demonstrates	Relevant OfS Condition(s)
Bribery and corruption concern report form	Provides a formal, confidential mechanism for staff and stakeholders to report suspected bribery, corruption, or financial misconduct, supporting early detection, investigation, and appropriate escalation of concerns	E8 (Fraud and inappropriate use of public funds), E2 (Management and governance), E3 (Accountability)
Gift and hospitality declaration form	Enables transparent declaration and monitoring of gifts and hospitality received or offered by staff, supporting the prevention	E8 (Fraud and inappropriate use of public funds), E2 (Management and governance), E1 (Public interest governance)

	of undue influence, bribery, and conflicts of interest	
Conflict of interest declaration form	Provides a structured process for identifying, declaring, and managing actual or potential conflicts of interest, ensuring impartial decision-making and protection of institutional integrity	E2 (Management and governance), E3 (Accountability), E1 (Public interest governance), C5 (Treating students fairly)
LAAT Financial Regulations	Defines internal financial controls, authorisation levels, accountability arrangements, and audit mechanisms to ensure proper financial management and prevent misuse of funds.	Condition D – Financial viability and sustainability (financial probity and protection of students); Condition E2 – Management and governance (effective internal control).
Gifts and Hospitality Policy	Provides transparent declaration and approval mechanisms for gifts and hospitality to prevent bribery, undue influence, or conflicts of interest.	Condition E2 – Management and governance (internal controls); Condition E3 – Accountability (documented oversight responsibility).
Conflicts of Interest Policy	Ensures disclosure and management of personal or financial conflicts that could influence institutional decisions or academic/financial integrity.	Condition E1 – Public interest governance (ethical governance); Condition E2 – Management and governance (risk management and control).
Whistleblowing (Public Interest Disclosure) Policy	Provides safe and confidential reporting routes for suspected bribery, corruption, or financial misconduct without fear of detriment.	Condition C1 – Consumer protection law (fair and transparent processes for stakeholders); Condition E2 – Management and governance (effective reporting and escalation mechanisms).

Staff Code of Conduct	Defines expected ethical and professional behaviour, reinforcing zero-tolerance of bribery and corruption and institutional integrity culture.	Condition E1 – Public interest governance (ethical leadership and conduct); Condition E2 – Management and governance (standards of behaviour and control).
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Bribery and Corruption – Concern Report Form

Use this form to report suspected bribery or corrupt behaviour.

Name of person reporting*

Role (Student / Staff / Other)*

Contact details*

Description of concern (dates, individuals, evidence)*

Immediate risk identified? (Yes / No)

Consent to process information*

Gifts and Hospitality Declaration Form

All gifts or hospitality must be declared in line with LAAT policy.

Name and role*

Date gift or hospitality offered/received*

Description and estimated value*

Organisation / individual involved*

Accepted or declined?*

Manager approval*

Conflict of Interest Declaration Form

This form must be completed where a potential or actual conflict of interest exists.

Name and role*

Description of conflict*

Related organisation or individual

Steps taken to mitigate conflict*

Manager / committee review outcome*

Date reviewed*
