

IBC Fraud, Bribery & Anti-Corruption Policy

1. Introduction and Purpose

The purpose of this policy is to articulate IBCM's unwavering commitment to preventing, detecting, and responding to fraud, bribery, and corruption in all its forms. These practices undermine trust, damage reputations, and expose organisations to significant legal and financial risks. By implementing robust controls and fostering a culture of integrity, IBCM ensures compliance with the Bribery Act 2010, Fraud Act 2006, and other applicable regulations. This policy reinforces our dedication to transparency, accountability, and ethical conduct across all operations.

2. Scope

This policy applies to: All employees, managers, directors, and officers of IBCM; Contractors, consultants, agents, and business partners acting on behalf of IBCM; All financial and operational activities, including procurement, admissions, and student fee processing. Compliance is mandatory for all individuals and entities within this scope, regardless of location or role.

3. Definitions

- **Fraud:** Any dishonest or deceptive act intended to secure personal or financial gain, including misrepresentation, falsification of records, or misuse of assets.
- **Bribery:** Offering, promising, giving, or receiving any financial or non-financial advantage to improperly influence a business decision or outcome.
- **Corruption:** Abuse of entrusted power for private gain, whether through collusion, favoritism, or manipulation of processes.
- **Facilitation Payments:** Small, unofficial payments made to expedite routine actions. These are strictly prohibited under this policy.

4. Roles and Responsibilities

- **Governing Body/Senior Leadership Team:** Approves this policy and ensures adequate internal controls are in place.
- **Compliance Officer:** Investigates reported cases, maintains incident logs, and ensures delivery of training programs.
- **Finance Department:** Implements financial controls, reconciliations, and audit trails to prevent irregularities.
- **Employees:** Must act honestly, avoid conflicts of interest, and report any concerns immediately through designated channels.

5. Preventive Controls

IBCM employs a range of preventive measures to mitigate risks:

- Segregation of duties to reduce opportunities for fraud; Dual authorisation for all payments and high-value transactions.
- Regular internal audits and compliance reviews.
- Comprehensive financial procedure manuals.
- Use of pre-approved supplier lists to ensure legitimacy.
- Mandatory conflict-of-interest declarations for staff and contractors.

6. Gifts and Hospitality

Gifts and hospitality must never be used to influence business decisions or secure an unfair advantage. Any item or benefit exceeding £30 must be declared and recorded in the Gifts & Hospitality Register. The register will be reviewed annually by the Compliance Officer to ensure transparency.

7. Reporting Fraud or Corruption

Employees and stakeholders are encouraged to report suspected fraud, bribery, or corruption promptly. Reports may be made to: Line Manager; Compliance Officer; Senior Leadership Team; Whistleblowing Channel (confidential and protected). All allegations will be investigated thoroughly and confidentially, with protection against retaliation for whistleblowers.

8. Investigation Procedures

An impartial investigation lead will be appointed for each case. Evidence will be gathered, documented, and preserved securely. Findings will be reviewed by senior management, and appropriate actions determined. Outcomes may include disciplinary measures, contract termination, or referral to law enforcement authorities.

9. Training and Awareness

IBCM provides comprehensive training to ensure awareness and compliance: Mandatory induction training for all new employees; Annual refresher training for staff in high-risk roles; Case-study-based workshops to reinforce practical understanding of fraud and bribery risks.

10. Review & Version History

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Originator	Quality Manager
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