

## Anti-Bribery, Corruption and Fraud Policy

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IFG is committed to carrying out its academic and business functions in an open and transparent way, operating with honesty and integrity both at home and overseas.

IFG recognises that bribery, corruption and fraud are not only criminal acts but also unethical behaviours that undermine trust and integrity within the organisation and beyond. These practices have severe legal, financial, and reputational consequences, threatening IFG's mission and values.

This policy establishes the College's stance against bribery, corruption and fraud, delineates the responsibilities of all employees and associates, and provides clear guidance on recognising, avoiding, and addressing unethical practices.

## **BRIBERY**

**The Bribery Act 2010** introduced several Bribery and Corruption offences and holds businesses and institutions liable for failing to prevent bribery carried out on their behalf, irrespective of where the bribe takes place. There are four offences covered by the Act:

1. active bribery (offering, promising, or giving a bribe)
2. passive bribery (requesting, agreeing to receive, or accepting a bribe)
3. bribery of a foreign public official
4. corporate offence of failure of commercial organisation to prevent bribery  
applicable to: both individuals and corporate bodies.

The Bribery Act applies to all IFG employees and any person performing services on its behalf (contractors, suppliers, distributors, agents, joint-ventures and subsidiaries).

We have a zero-tolerance approach to bribery and serious action will be taken against anyone found to be involved in bribery, up to and including dismissal. For associated persons, breach of this policy may result in contractual, legal and/or other sanctions.

### **Policy Statement**

This policy applies to all persons working for and/or on behalf of IFG or any of our subsidiary companies, or on our/their behalf, in any capacity, including employees at all levels and grades (whether permanent, fixed-term, temporary, fixed term or on a consultancy basis), directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives and business partners, sponsors, or any other person associated with us, wherever located.

This policy does not form part of any employee's contract of employment and is subject to amendment at any time.

In this policy, the term third party means any individual or organisation you come into contact with during the course of your work for IFG, and includes potential students, students, other education institutions, external funders, customers, suppliers, distributors, business contacts, agents, advisers, and government and public bodies, including their advisors, representatives and officials, politicians and political parties.

IFG is dedicated to limiting its exposure to bribery and corruption by:

- **Establish a clear anti-bribery and corruption policy** that provides comprehensive guidance for employees and stakeholders.
- **Deliver mandatory training** to all staff to ensure they can identify, prevent, and respond appropriately to bribery and corruption risks.
- **Encourage vigilance** and foster a culture where employees feel confident reporting concerns of bribery or corruption through clearly defined communication channels, including a whistleblowing mechanism.
- **Investigate allegations rigorously** and collaborate with law enforcement or other relevant authorities when necessary.
- **Take decisive disciplinary action** against individuals found to be engaging in bribery or corruption, ensuring consistency with this policy and other related frameworks.

IFG prohibits the following actions by employees, agents, or individuals acting on its behalf:

- Offering, giving, soliciting, or accepting bribes, whether monetary or in-kind, to gain undue commercial, contractual, or regulatory advantage.
- Using inducements to secure preferential treatment or personal advantage for themselves or others.
- Facilitating or expediting payments to public officials or private entities to influence routine processes or decisions.

IFG takes the following steps to assist in prevention of Bribery, Fraud and Corruption:

1. Risk Assessment - we conduct risk assessments considering internal and external risks, the countries in which IFG does business, the sector in which it operates, the types of transaction it undertakes and its business partners.
2. Due Diligence - we undertake pre contractual diligence on all third parties who provide services on our behalf. Contract conditions reflect Bribery Act considerations for agents and suppliers, who sign their acceptance of our Anti Bribery, Fraud and Corruption Policy.
3. Communication – we ensure that our regulations are understood throughout the organisation through internal and external communication and training;
4. Monitor and Review - we review and revise policies and procedures on an annual basis or following any significant changes.

### **Responsibilities**

The IFG Board of Governors has overall responsibility for ensuring that this policy complies with our legal and ethical obligations, and that all those under our control comply with its provisions.

The Academic Director has primary and day-to-day responsibility for implementing this policy, supported by the Finance and Compliance functions and subject to oversight by the Risk, Audit and Compliance Committee. The Academic Director is responsible for monitoring the policy's use and effectiveness, responding to queries, and ensuring that internal control systems and procedures are effective in countering bribery and corruption.

Management at all levels are responsible for ensuring those reporting to them understand and comply with this policy and are given adequate and regular training on it.

The Risk, Audit and Compliance Committee receives assurance on the effectiveness of anti-bribery, fraud, and anti-money laundering controls and reports to the Operations Board and IFG Board of Governors.

### **Acceptance of Gifts**

IFG permits the acceptance of small, inexpensive gifts, such as pens, diaries, or chocolates, as well as low-cost hospitality, such as tea or buffet lunches, that align with customary business practices. However, expensive or substantial gifts must be declined politely.

Any uncertainty regarding the appropriateness of accepting a gift should be referred to the Academic Director.

Staff must ensure that the acceptance of gifts or hospitality does not influence their business decisions or create a perception of bias.

### **Hospitality**

Staff receiving hospitality must exercise caution to avoid any real or perceived influence on their business decisions. It is essential to distinguish between modest, low-cost hospitality—such as a working lunch or evening meal—and more elaborate or expensive offerings, which should generally be declined. Modest hospitality is considered an accepted courtesy in professional relationships, provided it aligns with what IFG would reasonably offer in similar circumstances.

#### **Key Principles:**

##### Reasonableness and Proportionality

The frequency and scale of hospitality should not exceed what is customary or necessary for maintaining professional relationships. Frequent or recurring invitations, especially from the same source, may raise concerns about impartiality and should be politely declined.

Invitations to events hosted by voluntary organisations, such as annual conferences or dinners, are typically acceptable, as these engagements are integral to fostering relationships in these sectors. However, the hospitality offered must remain reasonable and proportionate.

##### Avoiding Misrepresentation and Perceptions of Bias

Staff must remain vigilant about how their actions may be perceived by others. Misrepresentation or favouritism, whether intentional or not, can damage IFG's reputation for integrity.

Meetings that involve hospitality outside working hours or in purely social settings should be justified as work-related and not as a personal gift or benefit.

##### Restrictions During Contract Negotiations

Hospitality of any kind, including attendance at seasonal events hosted by suppliers or contractors, must not be accepted during contract negotiations to prevent conflicts of interest or undue influence.

Staff must always prioritise transparency and ethical conduct when accepting hospitality, ensuring that their actions align with the values and principles of IFG. In cases of uncertainty, the matter should be referred to the Academic Director for guidance.

##### Employee Responsibilities

All employees, regardless of their position, share the responsibility of preventing and reporting unethical business practices. This includes:

Familiarising themselves with the policy and participating in anti-bribery training.

Remaining vigilant and reporting any suspicions of bribery or corruption through the channels outlined in the Whistleblowing Policy.

##### **Contextual Variations and Clarifications**

IFG acknowledges that cultural practices vary globally, and what is acceptable in one region may differ in another. However, this policy prohibits:

- Any gift, payment, or hospitality intended to gain personal or business advantage.
- “Facilitating” or “expediting” payments to secure prompt performance of routine duties.

The following practices are permitted if they are customary and proportionate:

- Appropriate and reasonable hospitality.
- Ceremonial gifts on special occasions.
- Provision of resources to improve decision-making efficiency.

If there is any doubt about the acceptability of an action, staff must seek clarification from the Academic Director.

### **Political and Charitable Contributions**

IFG maintains a strict approach to political and charitable contributions to uphold transparency, integrity, and compliance with ethical standards. IFG does not make any contributions, whether monetary, in-kind, or otherwise, to political parties, candidates, or causes, ensuring impartiality and avoiding any perception of undue influence or bias.

However, IFG supports charitable initiatives under clearly defined conditions. All charitable contributions must be disclosed publicly to ensure transparency, comply with applicable legal and ethical standards, and receive prior approval from the Academic Director. This ensures that charitable contributions are legitimate and not used to facilitate or conceal acts of bribery. By adhering to these principles, IFG reinforces its commitment to ethical conduct and the values of Integrity, Accountability, and Transparency.

### **Reporting Concerns and Protection**

IFG provides robust mechanisms for employees to report concerns about bribery or corruption.

**Raising a Concern:** Staff are encouraged to report any suspicions of bribery or corrupt activities to their line manager or the Academic Director. Uncertainties about potential misconduct should also be raised promptly.

**Victims of Bribery:** Employees who are offered a bribe or suspect corrupt activities must immediately report the incident to their line manager or the Academic Director

**Protection for Whistle-blowers:** IFG ensures that no employee suffers detrimental treatment—such as dismissal, intimidation, or disciplinary action—for refusing to participate in corrupt activities or reporting concerns in good faith. Staff who believe they have been unfairly treated should report the issue to their line manager, the Academic Director, HR or legal counsel.

## ANTI-MONEY LAUNDERING

IFG is committed to ethical standards of business conduct and adopts a zero-tolerance approach to financial misconduct, including money laundering. We uphold legislation for countering money laundering, including, The Proceeds of Crime Act 2002 (as amended by the Crime and Courts Act 2013 and the Serious Crime Act 2015), the Terrorism Act 2000 (as amended by the Anti-Terrorism, Crime and Security Act 2001), Counter-Terrorism Act 2008 Schedule 7, and the Money Laundering, Terrorist Financing and Transfer of Funds (Information on the Payer) Regulations 2017, HM Treasury Sanctions Notices and News Releases, now incorporated in the Money Laundering Regulations 2017 and the Criminal Finances Act 2017.

The purpose of this policy is to outline how IFG and its staff manage money laundering risks, apply 'Know your Payer' principles and comply with the relevant regulations.

The policy applies to all members of staff, and breach of this policy may be seen as a disciplinary offence. The key requirement for employees is to promptly report any suspected money laundering activity to the Directors of IFG. We ensure that our regulations are understood throughout the organisation through internal and external communication and training.

### **What is money laundering?**

Money laundering is the process of taking the proceeds of criminal activity and making them appear legal. It can also encompass financial transactions involving money, however obtained, which is used to fund terrorism. The definition of money laundering activities under the legislation referenced above is broad.

There are three principal money laundering offences under the Proceeds of Crime Act 2002:

- concealing, disguising, converting, transferring criminal property or removing it from the UK (section 327 of the 2002 Act); or
- entering into or becoming concerned in an arrangement which you know, or suspect facilitates the acquisition, retention use or control of criminal property by or on behalf of another person (Section 328); or
- acquiring, using or possessing criminal property (section 329)

These offences can be punishable by unlimited fines and/or terms of imprisonment up to a maximum of 14 years.

There are also associated offences regarding due diligence and disclosures, including:

- Failure to disclose any of the three primary offences.
- Failure to have adequate procedures for mitigating the risk of money laundering.
- Tipping off. Tipping off is where someone informs a person or people who are, or who are suspected of being involved in money laundering in such a way as to reduce the likelihood of their being investigated or prejudicing and investigation.

### **Steps IFG takes to prevent money laundering**

**Maintaining adequate records of transactions** relevant transactions must be kept for at least six years including:

- Student identification evidence

- Details of financial transactions carried out

**Implementing a procedure to enable the reporting of suspicious activity;** The legislation requires IFG to disclose when it has actual knowledge or suspicion of money laundering. We should be familiar with the type of customer who normally approaches us for business, and how they normally deal with us. Suspicion may be aroused if a customer deals with us differently to our normal experience or wants things that are out of the ordinary for the type of business concerned. If suspicion is aroused members of staff should forward their concern to the directors of IFG. Suspicion may also be highlighted through our bank or other third parties.

**Implementing customer identification or ‘know your customer’ procedures;** When taking orders for business from customers, staff must be reasonably satisfied as to the identity of the customer that they are engaging with. It is important that due diligence controls are in place to identify the student, customer or other party dealing with IFG. Satisfactory evidence of identity must be obtained. Examples include passports, visas and birth certificates. If an organisation is not known to us, we look for letter-headed documents, check websites, request credit checks or aim to meet or contact key sponsors as we feel appropriate to verify the validity of a contact.

**Maintaining Anti-Money Laundering as part of our Risk Assessment.** This assessment covers products or services which we provide, strategic academic partners, agents and suppliers.

## **FRAUD**

### **Purpose**

This policy outlines IFG's approach to preventing, detecting, and responding to fraud within the institution. It reinforces our commitment to integrity, accountability, and transparency in all financial and operational activities.

- Misappropriation of funds or assets
- Falsification of academic or financial records
- Bribery and corruption
- Identity theft
- False representation of qualifications or credentials

### **Definition of Fraud**

Fraud is defined as any intentional act of dishonesty to gain an unfair or unlawful advantage. It includes deception, misrepresentation, or concealment of material facts to manipulate outcomes or gain personal benefit.

### **Key Risks in Higher Education**

Fraud risks in the HE sector can arise from multiple sources, including:

- Financial fraud: Misappropriation of funds, false invoicing, or payroll fraud.
- Procurement fraud: Collusion with suppliers, contract manipulation, or fake vendors.
- Academic fraud: Plagiarism, falsification of grades, or fraudulent admissions.
- Identity and document fraud: Fake qualifications or forged documentation by applicants or staff.

### **Responsibilities**

IFG Board of Governors and Senior Leadership: Ensure appropriate systems are in place to prevent and detect fraud.

Managers and Supervisors: Implement internal controls, conduct risk assessments, and report concerns.

All Staff and Students: Be alert to potential fraud, comply with institutional policies, and report any suspicions immediately.

Finance and Compliance Teams: Monitor transactions, conduct audits, and support investigations.

### **Reporting Fraud**

Suspected fraud must be reported promptly to the designated fraud officer or through the IFG Whistleblowing Procedure. Reports will be treated confidentially and investigated impartially.

### **Investigation Procedure**

- a) An initial review of the allegation will take place by the Finance and HR Manager or in their absence the Academic Director where a decision will be made to proceed with a formal investigation based on the severity of the potential fraud and evidence made available at that stage.
- b) Where a formal investigation has been agreed to take place, the lead will scope the investigation

and set objectives and a plan for gathering evidence, including identifying key witnesses and documents.

- c) A process to gather relevant documents, emails, transaction logs and statements will be undertaken and then that evidence analysed for patterns, trends and inconsistencies
- d) Where needed, interviews will be conducted with any witnesses and the suspect to elicit truthful information and assess the credibility of individuals.
- e) A comprehensive report will be produced by the lead investigator summarising the investigation process and any findings. The report will also include any evidence, analysis and conclusions and recommended actions.

#### **Disciplinary Action**

If fraud is confirmed, disciplinary procedures will be initiated in accordance with IFG's HR and student conduct policies. Legal authorities may be involved when appropriate.

Where deemed necessary, IFG will seek external professionals to support the investigation and where criminal activity has been identified, IFG will inform the police.

In major incidents or where fraud has impacted public funds in any way, IFG will report this to the Office for Students as a reportable event.