



“Enabling Students to Accomplish their Academic Goal”

Anti-Bribery and Corruption Policy

DOCUMENT CONTROL

Policy Number: BCP4

Version: 1.0

Date: March 2026

Owner: Head of Quality and Operations

Approved by: Board of Directors

Next Review: March 2027

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March 2026

Contents:

1. Introduction.....	3
2. Purpose.....	3
3. Scope and principles.....	4
4. Regulatory, legal and quality assurance framework.....	4
5. Definitions and core standards.....	6
6. Prohibited conduct and higher education risk areas.....	7
7. Gifts, hospitality, donations, sponsorship and conflicts.....	10
8. Third parties, procurement, recruitment, admissions and partner provision.....	11
9. Reporting concerns, investigations and outcomes.....	13
10. Records, registers, training and implementation framework.....	14
Minimum register and checklist fields (Refer to Appendices).....	17
11. Roles and responsibilities.....	17
12. Governance and committee oversight.....	18
13. Monitoring, review and continuous improvement.....	20
14. Conclusion.....	20
Appendix A: Gifts and Hospitality Register minimum fields.....	21
Appendix B: Anti-bribery declaration form.....	21
Appendix C: Third-party anti-bribery due diligence checklist.....	22
Appendix D: Red flags and escalation guide.....	23

1. Introduction

Bellmont College is committed to acting honestly, fairly and transparently in its academic, operational, financial, recruitment, partnership and governance activities. Belmont College does not tolerate bribery, corruption, kickbacks, facilitation payments, improper inducements, undisclosed conflicts of interest or any conduct that could compromise student interests, academic standards, public funds, public trust or confidence in Belmont College.

This policy provides a proportionate anti-bribery and corruption framework across governance, staff conduct, finance, conflicts, whistleblowing, admissions, procurement, student records, assessment, quality assurance and partner arrangements. It should be read alongside (*QGP1 Belmont College Quality Handbook; QGP2 Belmont College Management, Committee Structure, Organogram and Terms of Reference; HRP2 Belmont College Employee Handbook; BCP4 Belmont College Fraud and Inappropriate Use of Public Funds Policy; QGP7 Belmont College Conflict of Interest Policy; QGP8 Belmont College Whistleblowing and Public Concern Policy*)

Bellmont College currently works with Liverpool Hope University for relevant higher education provision. Under the current partnership, Belmont College delivers local teaching, learning support and operational services, while Liverpool Hope University retains relevant awarding, academic regulation and partner oversight responsibilities. Belmont College is also seeking Office for Students approval for its own funding arrangements. Future regulatory, partnership or funding developments may result in changes to Belmont College arrangements; any change is managed through formal governance, clear communication, risk assessment and student protection controls so that student interests continue to be protected (*QGP1 Belmont College Quality Handbook; CAP1 Belmont College Student Protection Plan and Policy; LHU QH8 Liverpool Hope University Academic Partnership Handbook*).

This policy operates within current Liverpool Hope University partnership arrangements and remains adaptable for future approved delivery, funding or awarding-body arrangements. Where Liverpool Hope University procedure applies, Belmont College cooperates with the relevant University route, preserves evidence, signposts students and staff clearly, and does not override partner decision-making authority (*LHU Liverpool Hope University Academic Regulations; LHU Liverpool Hope University Student Contract; LHU Liverpool Hope University Anti-Bribery and Corruption Policy*).

2. Purpose

The purpose of this policy is to set a clear, readable and evidence-based framework for preventing, identifying, reporting and responding to bribery and corruption risks. It explains the standards expected of directors, committee members, staff, students where relevant, contractors, suppliers, consultants, recruitment representatives and any person or organisation acting for or with Belmont College.

The policy protects students, staff, directors, public funds, academic standards, partner responsibilities and the reputation of Belmont College by ensuring that decisions are based on evidence, fairness, approved criteria, proper authority and transparent records. It also explains how the policy is implemented, monitored and reviewed through Belmont College committees.

In practice, this policy supports fair admissions, transparent procurement, accurate student records, objective assessment and academic decisions, honest use of public or institutional funds, proper declaration of gifts and conflicts, safe reporting of concerns and proportionate investigation where issues arise (*RAP1 Belmont College Recruitment, Selection and Admission Policy; LTP2 Belmont College Assessment and External Examining Policy; LTP6 Belmont College Academic Integrity and Misconduct Policy; CAP2 Belmont College Consumer Protection Policy and Implementation Framework*).

3. Scope and principles

This policy applies to all Belmont College activities, whether delivered on site, online, remotely, through a partner arrangement, through a contractor or through a third party acting for or with Belmont College. It applies regardless of the value of the advantage, whether the conduct takes place in the United Kingdom or overseas, whether the benefit is offered directly or indirectly, and whether the advantage is financial or non-financial.

The policy applies to the Board of Directors, committee members, the CEO, the Senior Management Committee, academic staff, professional services staff, finance staff, admissions and registry staff, student support staff, hourly paid staff, agency staff, visiting staff, consultants, contractors, suppliers, referrers, recruitment representatives, partner organisations and other associated persons. It may also apply to students, applicants or former students where their conduct relates to bribery, corruption, admissions, assessment, attendance, records, services, Belmont College resources or third-party relationships.

Bellmont College's approach is based on zero tolerance, proportionality, transparency, fairness, accountability, non-retaliation, student protection and partner alignment. Zero tolerance means that every reasonable concern is taken seriously, assessed promptly and handled fairly. It does not mean that every concern is automatically treated as proven misconduct. Genuine error, misunderstanding, negligence, deliberate dishonesty and criminal conduct are distinguished through proportionate assessment and, where required, investigation.

Where a staff member, student, contractor or other person is unsure whether a gift, payment, hospitality offer, conflict, donation, sponsorship, referral arrangement or third-party request is appropriate, the expected action is to stop, seek advice, record the issue and obtain approval before proceeding. Silence, informal agreement or failure to record a concern must not be used to bypass this policy.

4. Regulatory, legal and quality assurance framework

The legal, regulatory and sector expectations below inform the whole policy. They are consolidated in this section and are not repeated under every operational topic.

Requirement	Relevance to this Policy
Bribery Act 2010	Creates offences for offering, promising or giving a bribe; requesting, agreeing to receive or accepting a bribe; bribery of a foreign public official; and failure

Requirement	Relevance to this Policy
	by an organisation to prevent bribery by associated persons.
Ministry of Justice Bribery Act 2010 Guidance	Explains proportionate anti-bribery procedures, including top-level commitment, risk assessment, due diligence, communication, training, monitoring and review.
Fraud Act 2006, Proceeds of Crime Act 2002 and Criminal Finances Act 2017	Applies where bribery overlaps with fraud, false representation, money laundering, abuse of position, improper payments or failure to prevent facilitation of tax evasion.
Public Interest Disclosure Act 1998 and Employment Rights Act 1996	Protects eligible workers who raise qualifying public interest concerns about wrongdoing, including bribery, corruption, fraud or concealment.
Higher Education and Research Act 2017	Establishes the Office for Students regulatory context for English higher education providers, including registration, quality, governance and student protection.
Office for Students Conditions B1, B2, B3, B4 and B7	Relevant because bribery or improper influence can affect academic experience, resources, support, student outcomes, assessment integrity and the credibility of quality arrangements.
Office for Students Conditions C1-C3, E2 and F3	Relevant because student information, consumer protection, student protection, governance, management and regulatory reporting rely on accurate records and fair decision-making.
CMA expectations and consumer protection law	Requires clear, accurate and timely student information, fair terms and fair routes for complaint or redress where misleading information or improper influence affects decisions.
UK Quality Code for Higher Education	Provides sector principles for academic standards, quality assurance, student partnership, external partnerships, admissions, assessment and continuous enhancement.
UK General Data Protection Regulation and Data Protection Act 2018	Requires declarations, registers, admissions records, investigation files, student data and committee reports to be handled lawfully, securely and proportionately.

Requirement	Relevance to this Policy
Equality Act 2010	Requires anti-bribery controls, reporting routes, investigations and outcomes to be applied fairly, accessibly and without discrimination, harassment or victimisation.
Counter-Terrorism and Security Act 2015, safeguarding duties and relevant health and safety duties	Relevant where improper pressure, coercion, exploitation, scams or threats overlap with safeguarding, Prevent, welfare or safety concerns.

Bellmont College internal controls that support this framework include information governance, risk management, data protection, equality, safeguarding, student protection and staff conduct arrangements (QGP6 Bellmont College Information Governance, Public Information and Transparency Policy; BCP1 Bellmont College Risk Management Policy; BCP7 Bellmont College General Data Protection & Regulation (GDPR) Policy; SWP2 Bellmont College Equality, Diversity and Inclusion Policy; HSP1 Bellmont College Safeguarding and PREVENT Policy; HRP3 Bellmont College Staff Grievance and Disciplinary Policy)

5. Definitions and core standards

The following definitions help staff, students, directors and third parties recognise concerns early. A matter does not need to fit perfectly into one definition before it is reported. If the circumstances feel improper, hidden, pressured, unusually generous, undocumented or linked to a decision, the safest approach is to declare the matter and seek advice.

Term	Meaning for Bellmont College
Bribery	Offering, promising, giving, requesting, agreeing to receive or accepting a financial or other advantage to induce, reward or influence improper performance or obtain an improper advantage.
Corruption	The misuse of entrusted power, position, information, funds or resources for personal, organisational or third-party gain.
Financial or other advantage	Money, gifts, hospitality, travel, accommodation, discounts, loans, services, donations, sponsorship, jobs, references, commissions, academic favours, admissions favours or preferential treatment.
Facilitation payment	An unofficial payment or benefit intended to secure or speed up a routine action. These payments are prohibited, even where described as local custom or administration.

Term	Meaning for Belmont College
Kickback	A hidden payment, commission, rebate, gift or benefit given in return for awarding business, referring applicants or students, influencing a decision or providing access.
Associated person	A person or organisation performing services for or on behalf of Belmont College, including staff, contractors, consultants, suppliers, representatives, referrers or partner contacts.
Conflict of interest	A personal, financial, family, professional or other interest that could influence, or appear to influence, Belmont College responsibilities or decisions.
Improper influence	Any pressure, inducement, threat, favour or hidden arrangement that could compromise independent judgement, fair process, academic standards or student interests.

Bellmont College's core standard is simple: no person covered by this policy may offer, promise, give, request, agree to receive or accept any advantage intended to influence a Belmont College, partner, student, procurement, financial, academic, staffing or governance decision. This standard applies even if the advantage is small, indirect, non-financial, framed as a donation or sponsorship, or offered through a friend, family member, agent, supplier or student representative.

6. Prohibited conduct and higher education risk areas

The following conduct is prohibited: offering or accepting bribes; making or receiving facilitation payments; receiving or paying kickbacks; using donations, gifts, hospitality, discounts, travel or personal favours to influence decisions; falsifying or concealing records; bypassing approved controls; using a third party to do something that would be prohibited if done directly; and retaliating against a person who refuses to participate in bribery or raises a genuine concern.

The main higher education risk areas for Belmont College are admissions and student recruitment, applicant referrals, procurement and suppliers, student records, attendance and engagement data, assessment and academic decision-making, gifts and hospitality, donations and sponsorship, partner provision, regulatory submissions and committee decision-making. These risks are managed through published criteria, evidence-based records, quality monitoring, committee oversight and partner alignment (*QGP1 Belmont College Quality Handbook; LTP9 Belmont College Attendance, Retention and Submissions Policy; LHU Liverpool Hope University Anti-Bribery and Corruption Policy*).

Risk area	What could go wrong	Bellmont College control	Supporting evidence
Admissions and recruitment	A gift, payment, referral benefit, false	Use published criteria, structured	Admissions records, interview notes,

Risk area	What could go wrong	Bellmont College control	Supporting evidence
	document or external pressure is used to influence interview, eligibility, offer or confirmation decisions.	interviews, identity and qualification checks, recorded decision rationale and Liverpool Hope University approval where required.	qualification checks, Liverpool Hope University admissions communications and Recruitment, Admissions & Registry Committee reports.
Student records, attendance and funding	Attendance, engagement, enrolment or student status records are falsified or manipulated to secure funding, avoid reporting or protect continuation statistics.	Maintain clear records, segregation of duties, audit trails, data checks and escalation of anomalies.	Attendance records, engagement data, student record checks, exception logs, risk entries and Senior Management Committee action tracking.
Assessment and academic decisions	A student, relative or third party seeks to influence marking, mitigation, moderation, academic misconduct, appeals or progression decisions.	Refuse and report the offer, preserve evidence and follow academic, misconduct, appeals or partner procedures.	Assessment briefs, marking records, internal moderation, IQA sampling, Assessment Board records, external examiner records and partner referrals.
Procurement and suppliers	A supplier offers gifts, private benefits, commissions or employment opportunities to influence quote, tender, contract or invoice decisions.	Declare conflicts, use approved procurement controls, record decisions and remove conflicted individuals where necessary.	Procurement file, quotations, purchase approvals, invoices, conflict declarations, due diligence checklist and risk register updates.
Gifts, hospitality and travel	Hospitality is excessive, repeated, timed around a decision or connected to	Apply thresholds, seek approval, record in the register and refuse offers	Gifts and Hospitality Register, approval emails, manager decisions and annual register summary to

Risk area	What could go wrong	Bellmont College control	Supporting evidence
	preferential treatment.	linked to active decisions.	the appropriate committee.
Donations and sponsorship	A donation or sponsorship is offered in return for admissions, grades, contracts, publicity, access or influence.	Require senior approval, recorded purpose, source checks and clear separation from decision-making.	Senior approval record, source check, decision record, finance record and conflict mitigation note.
Third parties and representatives	A consultant, referrer, agent or contractor requests an unusual fee, hidden commission or payment to another person.	Use written terms, risk-based due diligence, invoice checks and termination rights.	Written agreement, due diligence checklist, invoice trail, monitoring note and contract review record.
Partner provision	A concern affects Liverpool Hope University admissions, academic regulations, assessment, complaints, appeals, misconduct or student contract responsibilities.	Preserve evidence, notify the relevant Belmont College lead and follow the Liverpool Hope University route where University authority applies.	Partner referral, evidence file, local action log and reports through the Quality Committee, Academic Committee or Senior Management Committee as appropriate.
Governance and committees	A director, committee member or senior staff member has an undeclared interest that may influence a decision.	Declare interests before meetings, minute mitigations, withdraw from decisions where required and report patterns to governance.	Declarations of interest, minutes, action logs, Audit and Risk Committee reports and Board of Directors assurance records.

The examples above are not exhaustive. A concern may still be reportable even if it does not appear in the table.

7. Gifts, hospitality, donations, sponsorship and conflicts

Gifts and hospitality are not automatically prohibited. Modest and proportionate working refreshments, professional hospitality or educational networking may be acceptable where there is a clear business or academic purpose and no expectation of preferential treatment. Belmont College must be able to show that gifts, hospitality, donations and sponsorship did not influence, and could not reasonably appear to influence, admissions, procurement, assessment, recruitment, funding, complaints, appeals, student support, partner, regulatory or governance decisions.

The safest approach is to decline any offer that is linked to an active decision, linked to a student or applicant outcome, unusually generous, repeated, hidden, offered in cash or cash equivalent, or likely to create embarrassment if publicly disclosed. Declarations and mitigations are handled consistently with (*QGP7 Belmont College Conflict of Interest Policy; BCP4 Belmont College Fraud and Inappropriate Use of Public Funds Policy*)

Offer / situation	Bellmont College rule	Approval or action	Supporting evidence
Cash or cash equivalent	Must not be accepted or offered.	Refuse and report immediately. If received unexpectedly, secure it and seek senior advice.	Concern log, secure handover note and escalation record.
Low-value working refreshment or modest hospitality	May be acceptable if proportionate, infrequent and not connected to an active decision.	Record where local register rules require it or where there could be perceived influence.	Register entry where required and manager note where advice is given.
Gift or hospitality above £25	Must be declared, even where accepted or refused.	Line manager review and Gifts and Hospitality Register entry.	Register entry, manager decision and reason for acceptance or refusal.
Gift, hospitality, travel, accommodation or benefit above £50	Requires prior written approval unless exceptional circumstances make prior approval impossible.	Relevant Head of Department or Head of Quality and Operations approval.	Written approval, conflict check and register entry.

Offer / situation	Bellmont College rule	Approval or action	Supporting evidence
Item above £100, repeated offers or any offer linked to admissions, assessment, procurement, complaints, appeals, funding or partner decisions	Normally refused and escalated.	CEO or delegated senior manager; Board Chair involvement where senior conflict exists.	Escalation record, refusal note, committee or Board assurance record where appropriate.
Donation or sponsorship	Must not be accepted where linked to favourable treatment, admission, award, contract, publicity or decision-making.	CEO approval, source check, written purpose and clear separation from decision-making.	Source check, finance record, approval record and conflict mitigation.
Conflict of interest	Must be declared before taking part in the relevant decision.	Committee chair, manager or decision owner records mitigation and withdrawal where required.	Committee minutes, declaration form, procurement record, HR record or admissions/assessment record.

If refusal of a gift would cause serious offence or practical difficulty, the matter is declared immediately. Belmont College may decide to retain the item for Belmont College use, donate it to charity, share it transparently for staff or student benefit, return it with explanation or record a controlled exception. The person who received the offer must not decide this alone where there is any real or perceived conflict.

8. Third parties, procurement, recruitment, admissions and partner provision

Bellmont College may be exposed to bribery risk through associated persons who perform services for or on behalf of Belmont College. This includes suppliers, contractors, consultants, professional advisers, recruitment representatives, referrers, overseas contacts, partner contacts, IT providers, marketing providers and any organisation that may influence student, financial, procurement or academic processes. Controls are proportionate to risk; routine low-value suppliers do not need an excessive compliance burden, but higher-risk relationships are checked, documented and monitored.

Student recruitment and admissions are particularly sensitive because applicants must be treated fairly and decisions must be based on published criteria, verified

evidence, structured assessment and Liverpool Hope University requirements where applicable (*RAP1 Belmont College Recruitment, Selection and Admission Policy; LHU Liverpool Hope University Recruitment and Admissions Policy; LHU Liverpool Hope University Student Contract*).

Bellmont College does not permit hidden commissions, informal referral rewards, unapproved success fees, payments to personal accounts, cash arrangements, false invoices, split payments designed to avoid approval limits, or any payment that cannot be matched to an approved service, contract, invoice and budget approval.

For Liverpool Hope University provision, Belmont College follows the applicable University route where admissions, assessment, academic misconduct, complaints, appeals, student contract, award or academic regulation responsibilities sit with the University. Liverpool Hope University partnership requirements state that partnership arrangements require approval, monitoring, review and signed agreements, and that the lead provider retains overall control of programme content, delivery, assessment and quality assurance arrangements. Belmont College therefore preserves evidence, notifies the relevant internal lead and liaises with the University through the appropriate partner route (*LHU QH8 Liverpool Hope University Academic Partnership Handbook; LHU Liverpool Hope University Academic Regulations*).

Third-party control	Minimum expectation	Supporting evidence
Appointment	Use approved procurement, recruitment or partnership routes before a person or organisation acts for Belmont College.	Approval record, contract or written terms; committee approval where relevant.
Due diligence	Check identity, role, service, conflicts, reputation and payment arrangements in proportion to risk.	Due diligence checklist, notes, procurement file and conflict declaration.
Contract terms	Include anti-bribery, conflict, data protection, confidentiality, termination and audit or right-to-check expectations where appropriate.	Signed agreement, purchase terms or partner agreement.
Payment controls	Pay only against approved invoices, services and bank details. Avoid personal accounts, cash or unexplained commissions.	Invoice, purchase order, approval, payment record and budget-holder sign-off.
Monitoring	Review unusual fees, high success rates, complaints, repeated referrals, overseas activity or unexplained pressure.	Contract review, risk log, action tracker, complaints themes and Senior

Third-party control	Minimum expectation	Supporting evidence
		Management Committee escalation.
Termination and escalation	Stop or suspend the relationship where a concern cannot be resolved safely.	Decision record, legal or Senior Management Committee advice and communication file.

9. Reporting concerns, investigations and outcomes

Anyone covered by this policy reports a suspected or actual bribe, corrupt act, improper offer, undisclosed conflict, hidden commission, improper third-party request, retaliation concern or record manipulation as soon as possible. Reports may be made to a line manager, the Head of Quality and Operations, the Head of Professional Services, the Head of Academic Programmes, the CEO, the Chair of the Board of Directors or through the whistleblowing route where normal line management reporting is unsuitable.

Concerns are handled promptly, fairly, confidentially and proportionately. Belmont College protects those who raise genuine concerns in good faith from retaliation, victimisation or unfair treatment and also protects the rights of individuals who are the subject of allegations until facts have been established (*QGP8 Belmont College Whistleblowing and Public Concern Policy; HRP3 Belmont College Staff Grievance and Disciplinary Policy; LHU Liverpool Hope University Whistleblowing Policy*).

Type of concern	Examples	Report to	Supporting evidence
Routine declaration	Gift, hospitality, minor conflict or low-risk query with no immediate evidence of wrongdoing.	Line Manager or Head of Quality and Operations.	Register entry, declaration form or advice note.
Operational concern	Possible improper influence in admissions, procurement, records, finance, assessment or student support.	Relevant manager plus Head of Quality and Operations.	Concern log, preserved evidence, action record and risk entry where relevant.
Serious concern	Cash offer, suspected fraud, public funds issue, repeated conduct, senior staff	CEO and Chair of the Board of Directors as appropriate.	Investigation record, risk escalation, committee assurance and

Type of concern	Examples	Report to	Supporting evidence
	concern, criminal risk or regulatory risk.		external notification where required.
Partner or academic issue	Concern affecting Liverpool Hope University admissions, academic regulations, assessment, misconduct, appeals, complaints or standards.	Head of Academic Programmes and partner route.	Partner referral, evidence file, local action log, Assessment Board or Academic Committee record where applicable.
Whistleblowing concern	Concern where ordinary reporting is inappropriate, conflicted or unsafe.	Whistleblowing route, CEO or Chair of the Board of Directors.	Protected disclosure record, confidentiality decision and outcome record.

Bellmont College first assesses whether immediate steps are needed to protect students, prevent further loss, suspend a payment, preserve records, remove a conflicted person from a decision, secure IT or finance evidence, or notify a partner. Investigations are proportionate to the concern and may involve HR, finance, registry, admissions, quality, academic leadership, IT, safeguarding, legal advice, partner liaison, external audit, police or another authority where appropriate.

Where a concern involves academic decisions, student conduct, academic misconduct, malpractice, complaints or appeals, Belmont College uses the correct academic or partner route rather than treating the matter solely as an employment or finance issue (*LTP6 Belmont College Academic Integrity and Misconduct Policy; LTP10 Belmont College Malpractice & Maladministration Policy; CAP3 Belmont College Complaint and Appeal Policy and Procedure; CAP5 Belmont College Academic Appeals Policy; LHU Liverpool Hope University Academic Regulations; LHU Liverpool Hope University Student and Apprentice Complaints Policy and Procedure; LHU Liverpool Hope University Academic Appeals Policy*).

Possible outcomes include no further action, advice, training, process improvement, refusal or return of a gift, removal from a decision, disciplinary action, student conduct action, academic misconduct referral, contract termination, recovery of funds, partner referral, audit action, police referral or notification to a relevant authority where required.

10. Records, registers, training and implementation framework

Anti-bribery procedures provide assurance only where they are implemented and evidenced. Belmont College maintains proportionate records that show what was declared, what was checked, who approved the decision, what action was taken and

how any risk or learning was monitored. Personal data is minimised, stored securely and shared only where there is a lawful and necessary reason.

Records are managed in line with Belmont College information governance, data protection, cybersecurity and quality assurance arrangements (QGP6 Belmont College Information Governance, Public Information and Transparency Policy; BCP7 Belmont College General Data Protection & Regulation (GDPR) Policy; BCP6 Belmont College Information Security and Cybersecurity Policy; QGP1 Belmont College Quality Handbook)

Record area	Minimum record	Owner	Monitoring
Gifts and Hospitality Register	Offer, source, value, date, decision, approval, reason and whether accepted, refused, returned or donated.	Head of Quality and Operations.	Reviewed at least annually and escalated if patterns or high-risk offers arise.
Conflict of Interest Register / declarations	Nature of interest, affected decision, mitigation, withdrawal from decision and approval.	Relevant manager or committee chair.	Reviewed before meetings, procurement decisions, admissions decisions and assessment or staffing matters.
Third-party due diligence records	Identity, role, service, risk level, checks, conflicts, contract terms, invoices and review notes.	Contract owner, Finance or Senior Management Committee.	Risk-based review at appointment, renewal and where concerns arise.
Admissions and academic evidence	Interview records, eligibility checks, attendance and engagement data, assessment evidence, mitigation, misconduct referrals, moderation or partner referrals.	Professional Services and Academic teams.	Reviewed through admissions, academic, quality and partner governance.
Incident and investigation records	Concern, evidence, decision, actions, findings, outcome, lessons learned and closure evidence.	CEO or Head of Quality and Operations.	Reported through the Senior Management Committee, Audit and Risk Committee, Academic Committee or

Record area	Minimum record	Owner	Monitoring
			Board of Directors as appropriate.
Training and communication records	Induction, staff briefings, role-specific training, supplier communication and policy acknowledgement.	HR, managers and Head of Quality and Operations.	Reviewed annually or after a significant incident or policy change.

The implementation framework below sets out how Belmont College makes the policy operational in a proportionate way.

Control stage	How Belmont College implements it	Evidence of implementation
Prevent	Maintain clear policy standards, approval thresholds, staff induction, procurement controls, admissions records, conflict declarations and partner alignment.	Policy, registers, induction, approval records, Quality Handbook evidence and committee minutes.
Identify	Use staff awareness, red flags, data checks, student or staff concerns, supplier monitoring, admissions review and audit findings to identify issues.	Concern log, exception reports, student feedback themes, module or programme review action plans, risk register and audit or quality action log.
Escalate	Route concerns to the right internal lead, committee, partner or external authority depending on seriousness and area affected.	Escalation record, partner referral, investigation decision, risk entry and committee action tracker.
Respond	Preserve evidence, manage conflicts, suspend risky activity, investigate fairly, protect students and implement appropriate outcomes.	Investigation file, outcome letter, contract action, HR or student action, partner action or process change.
Learn and improve	Review themes, update controls, provide training, report to committees and track actions to completion.	Committee report, annual monitoring, student voice action updates, staff development record and policy review record.

Minimum register and checklist fields (Refer to Appendices)

Record / checklist	Minimum fields or prompts
Gifts and hospitality	Date; person receiving or declaring; source; relationship to Bellmont College; estimated value; reason; decision affected; accepted, refused, returned or donated; approver; mitigation; date closed.
Anti-bribery declaration	Name; role or organisation; declaration of no improper payments; conflicts; gifts or hospitality offered or received; third-party involvement; confirmation of policy understanding; signature and date.
Third-party due diligence	Legal name; service; owners or key contacts where relevant; procurement route; conflicts; payment method; bank details; reputation checks; sanctions or adverse media checks where proportionate; anti-bribery clause; approval.
Red flags and escalation	Lavish or repeated gifts; unexpected commission; cash request; payment to personal or overseas account; refusal to provide invoice; pressure to bypass controls; demand for employment or advantage; link to admissions, awards or contracts.

11. Roles and responsibilities

Everyone covered by this policy has a responsibility to act with integrity and to report concerns promptly. The table below explains key responsibilities.

Role / Body	Responsibility
Board of Directors	Retains ultimate governance oversight of integrity, risk appetite, student interests, regulatory compliance and the effectiveness of anti-bribery and corruption controls.
Chair of the Board of Directors	Provides an escalation route where concerns involve the CEO, senior staff, directors or serious institutional risk.
CEO	Provides executive accountability for top-level commitment, implementation, resourcing, escalation and decisions where serious concerns or external notifications are required.
Head of Quality and Operations	Coordinates policy implementation, registers, declarations, due diligence evidence, investigation records, training, risk escalation, committee reporting and annual review.

Role / Body	Responsibility
Head of Academic Programmes	Provides academic leadership where bribery, corruption or improper influence may affect academic standards, assessment, academic integrity, appeals, partner processes or student outcomes.
Head of Professional Services	Oversees admissions, registry, student records, student support, student-facing communications and operational controls that protect fair processes and accurate records.
Head of IT and Human Resources	Supports secure digital systems, access controls, staff development, staff conduct processes and records that underpin implementation of this policy.
Finance and authorised budget holders	Maintain accurate, authorised and transparent records for payments, expenses, invoices, procurement, donations, sponsorship, gifts and hospitality.
Line managers and committee chairs	Ensure declarations are made, conflicts are managed, staff understand local controls and decisions are recorded through the appropriate route.
Staff, workers and associated persons	Act with integrity, follow this policy, refuse improper offers, declare concerns promptly and cooperate with checks and investigations.
Students and applicants where relevant	Do not offer benefits or apply pressure to secure admission, marks, attendance, records, support, outcomes or preferential treatment.
Liverpool Hope University and partner contacts	Retain responsibility for matters reserved to them under collaborative or partner arrangements and cooperate with Belmont College where shared concerns arise.

12. Governance and committee oversight

Bellmont College implements, monitors and reviews this policy through its established committee structure. The quality framework describes a three-tier model of strategic governance, monitoring and assurance, and operational delivery. Academic assurance is routed through the Quality Committee and Academic Committee, operational delivery through the Senior Management Committee, risk assurance through the Audit and Risk Committee, and ultimate oversight through the Board of Directors (*QGP1 Belmont College Quality Handbook; QGP2 Belmont College Management, Committee Structure, Organogram and Terms of Reference; BCP1 Belmont College Risk Management Policy*).

Committee / Body	How it implements and monitors this policy
Board of Directors	Maintains strategic oversight of governance integrity, student interests, serious or systemic risk, regulatory compliance and approval of this policy.
Audit and Risk Committee	Advises the Board of Directors on audit, internal control, risk management, financial sustainability, fraud, bribery, conflicts, procurement and assurance over public funds and institutional integrity.
Academic Committee	Acts as the academic authority and receives assurance where bribery, corruption or improper influence may affect academic standards, assessment, quality, student outcomes or partner academic responsibilities.
Senior Management Committee	Coordinates operational implementation, resource allocation, serious concerns, training, process weaknesses, third-party risks and cross-college corrective actions.
Quality Committee	Monitors academic quality, complaints and appeals themes, student voice, annual monitoring, action plans and quality enhancement where issues affect students or academic standards.
Learning and Teaching Committee	Considers teaching, assessment integrity, feedback, academic support and staff development themes arising from bribery, corruption or misconduct risks.
Recruitment, Admissions and Registry Committee	Monitors admissions controls, eligibility checks, applicant records, student data, recruitment or referral concerns and registry evidence.
Student Staff Committee	Provides a student voice route for concerns about fairness, transparency, communication or student-facing information without handling confidential investigations.
Liverpool Hope University partnership routes	Are used where concerns affect collaborative provision, partner academic responsibilities, awards, complaints, appeals, student protection or shared information.

Where a matter relates to Liverpool Hope University provision, Belmont College also uses the relevant Liverpool Hope University partner route. Internal reporting and partner reporting operate together so that evidence is preserved, responsibilities are clear and student interests are protected.

13. Monitoring, review and continuous improvement

The Head of Quality and Operations coordinates the review of this policy at least annually, or earlier where there is a significant incident, change in law, change in partnership arrangements, funding change, regulatory development, audit finding or committee recommendation. The review considers whether the policy remains clear, proportionate, practical and supported by evidence.

Monitoring is not limited to incidents. Belmont College reviews patterns in gifts and hospitality, conflicts, procurement concerns, admissions anomalies, student record exceptions, complaints themes, assessment or academic integrity issues, partner referrals, staff training and committee action completion. The purpose is to identify themes early, improve controls and communicate learning in a way that supports honest and fair practice.

Annual review is informed by quality monitoring, student feedback, staff development, audit and risk evidence, admissions and registry evidence, assessment evidence and partner requirements (*QGP1 Belmont College Quality Handbook; HRP1 Belmont College Staff Development Plan; QGP5 Belmont College Student Representative Handbook; LTP4 Belmont College Internal Verification Policy; LTP5 Belmont College IQA Sampling Plan & Record Policy and Procedure*).

Material changes to this policy are considered by the Senior Management Committee and, where appropriate, the Audit and Risk Committee and Academic Committee before approval by the Board of Directors. Minor administrative updates may be made by the Head of Quality and Operations where they do not change rights, responsibilities, thresholds or escalation routes, provided that the next committee report records the update.

14. Conclusion

Bellmont College maintains a clear and proportionate anti-bribery and corruption framework to protect students, staff, academic standards, public funds, partner responsibilities and confidence in Belmont College. The policy supports honest conduct, fair decision-making, accurate records, safe reporting and transparent governance.

The policy is implemented through day-to-day controls and monitored through Belmont College committee structure. Where a matter involves Liverpool Hope University provision, Belmont College works through the relevant University route while maintaining local records, escalation and student protection controls. Future regulatory, partnership or funding developments may change some operational arrangements, but Belmont College continues to place student interests, fairness, transparency and academic integrity at the centre of its approach.

Appendix A: Gifts and Hospitality Register minimum fields

Field	Entry
Date of offer or receipt	
Person receiving or declaring	
Role / department	
Source of gift or hospitality	
Relationship to Belmont College	
Estimated value	
Description and business purpose	
Decision, student, supplier or partner matter affected	
Accepted, refused, returned, donated or retained for Belmont College use	
Approval given by	
Mitigation / action required	
Date closed	

Appendix B: Anti-bribery declaration form

Declaration item	Details
Name:	
Role / department:	
Date:	
Nature of declaration:	Gift / hospitality / conflict of interest / third-party relationship / procurement concern / admissions or assessment concern / other
Details of declaration:	
Estimated value, if applicable:	

Declaration item	Details
Decision or process affected:	
Action taken or requested:	
Manager / approver decision:	
Signature:	

Appendix C: Third-party anti-bribery due diligence checklist

Checklist item	Evidence / notes
Legal name of third party	
Service or activity	
Procurement or appointment route	
Key contacts / owners where relevant	
Potential conflicts declared	
Payment method and bank details checked	
Invoice and contract arrangements checked	
Reputation, sanctions or adverse media checks where proportionate	
Anti-bribery, confidentiality, data protection and termination clauses included where appropriate	
Approval decision and reviewer	
Monitoring date / renewal date	

Appendix D: Red flags and escalation guide

Red flag	Required action
Cash, vouchers, personal discounts or loans offered to staff, students or decision-makers.	Refuse and report immediately.
Gift or hospitality offered during admissions, procurement, assessment, complaints, appeals, contract negotiation or investigation.	Refuse or seek approval before accepting; record and escalate.
A supplier, consultant, recruitment representative or referrer asks for unusual commission, cash payment, payment to a different account or payment to a third party.	Stop the transaction and escalate to Finance, Senior Management Committee route and the Head of Quality and Operations.
A staff member is connected to a supplier, applicant, student or third party involved in a decision.	Declare the conflict and remove the person from the decision unless formally approved mitigation is recorded.
Pressure to change admissions records, attendance records, marks, support records or assessment outcomes.	Escalate under this policy and the relevant academic or partner procedure.
Request to bypass procurement, finance, partner approval, quality assurance or evidence-retention requirements.	Do not proceed; escalate to the responsible manager and Head of Quality and Operations.
Suspected criminal conduct, deliberate falsification of records or misuse of public funds.	Escalate to CEO, Audit and Risk Committee route and consider external reporting.

Bellmont College Anti-Bribery and Corruption Policy					
Version	Date	Author(s)	Amendments	Approved by	Next review
1	March 2026	Head of Quality and Operations	New Document	Board of Directors	March 2027