



Anti-Fraud, Bribery and Corruption Policy

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1 POLICY

- 1.1 LSHTM's [values](#) include the commitment to 'act with integrity' – 'we hold ourselves to rigorous standards, both in our application of the scientific method and in our transparent, honest dealings with people and the world.'
- 1.2 These values underpin LSHTM's zero-tolerance attitude to fraud, bribery and corruption, whether actual or attempted.
- 1.3 LSHTM is committed to the highest levels of openness, integrity and accountability, both in letter and spirit. This applies equally to persons associated with LSHTM as a result of being an employee, officer (including Council members and independent co-opted members of governance Committees), agent, third-party, intermediary, representative, business partner or supplier, or through another role such as a subsidiary. This is not just a cultural commitment on behalf of LSHTM but reflects the fact that any financial impropriety could expose LSHTM or its employees and associated persons to the following risks: prosecution; fines and/ or imprisonment; reputational damage; or regulatory sanctions.
- 1.4 The offering, promising, paying, requesting or receiving of bribes is not permitted and LSHTM expects highest commitment to compliance in this area both from staff as well as third parties with which LSHTM is interacting.
- 1.5 LSHTM will uphold all laws relevant to countering bribery, fraud and corruption and any form of dishonesty in its transactions. Wherever LSHTM colleagues or agents operate they must abide by the laws of the UK as well as those of the country where the activities are taking place, whichever has the higher burden of requirements.

2 SCOPE

- 2.1 LSHTM activities are supported by substantial public funds, and as a publicly funded body, LSHTM is accountable to Council and to its stakeholders in ensuring the most efficient and effective use of its resources to support the delivery of LSHTM's strategy.
- 2.2 It is the responsibility of all members of staff to ensure the correct and honest use of all LSHTM's resources and to report any circumstances which may indicate the improper use of these resources. For the avoidance of doubt, this includes all staff at the Medical Research Council Unit The Gambia at the London School of Hygiene & Tropical Medicine, and The Medical Research Council/Uganda Virus Research Institute and London School of Hygiene & Tropical Medicine Uganda Research Unit. Such reports shall be made to the Chief Operating Officer and is highlighted in the [Financial Regulations](#) (paragraph 2.3.4) and further expanded in the [Whistleblowing/Public Interest Disclosure Policy](#). Named and/or anonymous reports can be made to the LSHTM Fraud email address: FraudConcerns@lshtm.ac.uk
- 2.3 Primary responsibility for the prevention and detection of fraud, bribery and corruption rests with the Executive Team. Procedures and controls are designed, implemented and tested to prevent and detect instances of fraud, bribery and corruption.
- 2.4 This Anti-Fraud Bribery and Corruption Policy and Code of Conduct has been adopted by Council and it is essential that everyone involved with LSHTM is aware of it, committed to it and abides by it.
- 2.5 Any breach of this policy will be considered as a serious matter and is likely to result in disciplinary action up to and including dismissal.
- 2.6 **Your responsibilities** – you must ensure that you read, understand and comply with this policy. The prevention, detection and reporting of bribery, fraud and other forms of corruption are the responsibility of all those working for us or under our control. All employees are required to avoid any activity that might lead to, or suggest, a breach of this policy.
- 2.7 For the avoidance of doubt, academic and scientific fraud is out of scope within this policy and should be reported via the [Allegations of Research Misconduct Policy](#).

3 PURPOSE AND OVERVIEW

- 3.1 Fraud, bribery and corruption are all categories of financial irregularity. A financial irregularity would be a breach of the standards of integrity expected by LSHTM, including the [Financial Regulations](#). The following definitions are not exhaustive, but designed to give an indication of the areas covered by the policy:
- 3.2 **Fraud** is intentional deception that results in advantage or financial gain to one party/and or a disadvantage or financial loss to another. This can include false accounting, misappropriation (i.e. theft), bribery and corruption, deception and collusion.

- 3.3 **Bribery** is the offer, promise, giving, demanding or acceptance of an advantage as an inducement for an action which is illegal, unethical, a breach of trust or the improper performance of a contract. Inducements can take the form of gifts, fees, rewards, jobs, internships, examination grades, favours or other advantages.
- 3.4 **Corruption** is the misuse of entrusted power for personal gain.
- 3.5 LSHTM's approach to preventing, investigating and reporting each of these is set out below.
- 3.6 The Economic Crime and Corporate Transparency Bill received Royal Assent in 2024 and is due to come into force. This will create a new offence of 'failing to prevent fraud'.
- 3.7 If LSHTM does not have reasonable fraud prevention controls and procedures in place, then its risk prosecution and potentially unlimited fines. This also applies if an LSHTM employee commits fraud under UK law, or targeting UK victims – LSHTM could still be prosecuted, even if the employee is based overseas. Likewise, prosecution under non-UK jurisdictions could also be applicable to LSHTM.
- 3.8 This new legislation does not change LSHTM's long-standing zero-tolerance approach to fraud, bribery and corruption.

4 FRAUD PREVENTION

- 4.1 Primary responsibility for the prevention and detection of fraud rests with individuals who also have responsibility to manage the risk of fraud. Investigation of fraud is the responsibility of the Chief Operating Officer who may set up a project team to investigate each case. The project team could include the internal auditors if appropriate.
- 4.2 Fraud is a broad term used to describe a number of activities including those listed above. The [Fraud Act 2006](#) includes three classes of fraud:
 - 4.2.1 Fraud by false representation
 - 4.2.2 Fraud by failing to disclose information
 - 4.2.3 Fraud by abuse of position
- 4.3 In all three cases of fraud, the Act requires that for an offence to have occurred, the person must have acted dishonestly, and that they have acted with the intent of making gain for themselves or anyone else, or inflicting loss (or risk of loss) on another.
- 4.4 In terms of applying the Fraud Response Plan within LSHTM, fraud is defined as the use of deception with the intention of:
 - 4.4.1 Gaining an advantage, personally and/or family and/or friends, or
 - 4.4.2 Avoiding liability or disadvantage, or
 - 4.4.3 Causing a financial and/or reputational loss to LSHTM or one of its subsidiary companies.
- 4.5 Whilst prevention of fraud is the key objective, when a fraud is suspected or suggested then prompt and professional action will be taken. Fraud is

unpredictable, time consuming to investigate, very disruptive and unpleasant. In addition to potential financial loss there may also be a risk of reputational loss.

- 4.6 Primary responsibility for the prevention and detection of fraud rests with individuals who also have responsibility to manage the risk of fraud. Investigation of fraud is the responsibility of the Chief Operating Officer who may set up a project team to investigate each case. The project team could include the internal auditors if appropriate.
- 4.7 Examples of fraud include:
 - 4.7.1 Theft – this may include the removal, misuse of funds, assets or cash.
 - 4.7.2 False accounting, dishonest destroying, defacing, concealing or falsifying any account, record or documents required for any accounting purpose, with a view to personal gain or gain for another, or with the intent to cause loss to LSHTM or subsidiary or furnishing information, which is, or may be, misleading, false or deceptive
 - 4.7.3 Abuse of position – this applies where fraud is committed in situations where someone by virtue of their position is expected to safeguard another's financial interests or not act against those interests.
 - 4.7.4 Fraud by false representation:
 - 4.7.4.1 Abuse of LSHTM's business related expenses systems by incurring Purchasing Card expenditure or submitting claims for reimbursement of costs which are excessive, not reflective of actual activities or were never wholly incurred.
 - 4.7.4.2 Completing recruitment application details stating that particular qualifications and/or membership of professional bodies are held when they are not, in order to meet the person specification requirements.
 - 4.7.4.3 Using LSHTM's logo or letterhead for personal reasons and to imply that LSHTM has sanctioned the content of the document (and/or to imply that the document is sent for and on behalf of LSHTM). Fraud by failing to disclose information.
 - 4.7.5 Failure to disclose a criminal conviction which may impact on the ability to remain employed in a particular position at LSHTM, and when in accordance with the [Rehabilitation of Offenders Act 1974](#).
 - 4.7.6 Fraud by abuse of position.
 - 4.7.7 A representative/employee of LSHTM is awarded monies from a third party to undertake research as a result of the position or work they have undertaken at the LSHTM. The representative/employee fails to expend the grant monies in ways that were intended and funds are used for personal benefit/gain.

5 BRIBERY PREVENTION

- 5.1 Under the UK Bribery Act 2010, an organisation must have 'adequate procedures' in place to prevent bribery.

- 5.2 LSHTM could be guilty of an offence under the Bribery Act if an 'associated person' carried out an act of bribery or corruption in connection with LSHTM's business. Most importantly, a person will be associated with LSHTM where they performs services for, or on behalf of, LSHTM; the association is widely interpreted and could be as a result of being an employee, or through another role such as a subsidiary, agent, third-party, intermediary or supplier.
- 5.3 The Bribery Act provides for strict penalties for 'active' (giving) and 'passive' (receiving) bribery by individuals, as well as companies. The four prime offences are:
- Two general offences covering the offering, promising or giving of an advantage, and requesting, agreeing to receive or accepting of an advantage
 - A discrete offence of bribery of a foreign public official; and,
 - An offence of failure by a commercial organisation to prevent a bribe being paid to obtain or retain business or a business advantage (with the defence being that the organisation has adequate procedures in place to prevent bribery).
- 5.4 Acts of bribery or corruption are designed to influence the individual in the performance of their duty and incline them to act dishonestly. The person being bribed is generally someone who will be able to obtain, retain or direct business. This may involve activities such as buying, selling or adjudication, or it may involve administrative tasks such as licences, customs, visas, fines or taxes. It does not matter when the act of bribery is committed, either before or after the activity has been undertaken.
- 5.5 Appendix 2 gives some examples of 'Red Flag' scenarios – potential acts of bribery or corruption under the Act – which are relevant to Higher Education Institutions. If staff, students or others associated with LSHTM encounter any activity that may potentially be considered bribery or corruption under the Act, or if they have any concerns regarding the application of this Code of Conduct, they should report it either:
- In accordance with the [Financial Regulations](#), to the Chief Operating Officer,
 - Or via the [Whistleblowing/Public Interest Disclosure Policy](#)

5.6 Who might engage in Bribery & Corruption?

- 5.6.1 Under the Bribery Act, bribery and corrupt behaviour might be committed by:
- An employee, officer, member of Council or independent co-opted member of governance Committees
 - A person acting on behalf of LSHTM (including agents, third-parties and representatives, which can include students)
 - Individuals, groups and organisations that authorise someone else to carry out these acts.

5.6.2 Bribery and corruption will often involve public or government officials and this is a specific offence under the Act. It is important, again, to recognise that 'government official' is widely interpreted and could include:

- A public official, in the UK or overseas
- A political candidate, or party official
- A representative of a government-owned or majority-controlled organisation
- An employee of a public international organisation.

5.7 Bribery & Corruption penalties

- 5.7.1 Bribery is a criminal offence in most countries and penalties can be very severe, potentially resulting in prison sentences of up to 10 years, unlimited fines or both. There are also other consequential penalties, such as being debarred from public (government) tendering.
- 5.7.2 The Bribery Act not only makes bribery illegal, but also holds organisations, including Higher Education Institutions, liable for failing to prevent such acts by those working for them, or on their behalf, irrespective of where the act takes place. Similar legislation is in place in many other countries, including the Foreign and Corrupt Practices Act (FCPA) in the USA.
- 5.7.3 It is in the interest of both LSHTM and the individual that everyone associated with LSHTM acts with propriety at all times and in all locations, both in the UK and overseas, where LSHTM business is conducted. Corrupt acts committed abroad may well result in prosecution at home.
- 5.7.4 Failure to comply with, or breach of, any parts of this Anti-Bribery & Corruption Code of Conduct could be regarded as a disciplinary offence, up to and including Gross Misconduct. Penalties could include dismissal without notice, or pay in lieu of notice, in accordance with LSHTM's disciplinary policy (or MRC disciplinary policies for staff locally employed by the Units) .

5.8 Controls & Record-Keeping

- 5.8.1 The management and control of gifts & hospitality, donations and similar activities are central to LSHTM having, and being seen to have, an effective Anti-Bribery & Corruption programme.
- 5.8.2 **Gifts & Hospitality** – it is essential that the guidance and process in LSHTM's Expenses & Benefits Manual are followed regarding acceptance, or otherwise, of any gift or hospitality of any value – although it must be stressed that some gifts and hospitality remain acceptable. LSHTM's Head of Legal and Compliance is responsible for maintaining a register, summary reporting and authorisation in exceptional cases.
- 5.8.3 **Donations** may only be accepted if they comply with LSHTM's [Fundraising Policy](#). Many issues related to donations arise from timing – for example, a donation coinciding with a tender or an application for a place at LSHTM. For this reason, it is essential that potential donations are fully considered in

line with LSHTM's Fundraising Policy and procedures and then formally accepted, or declined, through the authorisation process.

- 5.8.4 **Facilitation payments and kickbacks** – in many countries, it is customary business practice to make payments or gifts of small value to junior government officials, customs officers, parking wardens and people in similar official roles in order to speed up or facilitate a routine action or process. UK legislation makes no distinction between facilitation payments and bribes – regardless of value or local culture, even if that is 'how business is done'. **Facilitation payments as defined here are not permitted under this Code of Conduct and LSHTM takes the simple view that they are illegal – under UK jurisdiction, and in many other countries.**

- 5.8.4.1 However, there are clearly exceptions – **if a facilitation payment is extorted, or if personal safety or protection of life is involved.** Any payments made under duress must be recorded appropriately in conjunction with the Head of Governance.

- 5.8.5 **Conflicts of Interest** – LSHTM keeps a record of declared interests and it is essential that this is kept up-to-date by individuals associated with LSHTM in order to prevent any conflicts, or perceived conflicts, of interest. It must be recognised that transparency is of paramount importance and, as a consequence, potential conflicts of interest involving family members, business activities and other occupations must all be declared using the authorisation process. If a member of staff has any questions about what should be declared then these should be directed, in the first instance, to the Head of Legal and Compliance.

- 5.8.6 **Anti-Money Laundering (AML)** – procedures in relation to donations are covered by LSHTM's [Fundraising Policy](#). Approval of requests for the refund of payments made in advance, or made in error to LSHTM, are subject to LSHTM's internal financial controls which are designed to ensure that only legitimate payments are made. Under the Bribery Act, revenue from a contract that is gained through bribery may be considered to be the proceeds of a crime and, as a consequence, could come under the jurisdiction of the Proceeds of Crime Act. LSHTM has procedures in place to control tendering, the award and acceptance of contracts and payments to suppliers and sub-contractors. If any member of staff or associated person has concerns about money laundering in relation to any transaction they should report them to the Head of Legal and Compliance.

6 BRIBERY CONCERNS

- 6.1 **Raising a concern** – there are several routes to raise any bribery and corruption-related concern, or indeed, any concern related to the governance of LSHTM.
- 6.2 In the first instance, any concern can be raised with your line manager. If this is not possible or appropriate then it can be raised either:
- In accordance with the [Financial Regulations](#), to the Chief Operating Officer,
 - Or via the [Whistleblowing/Public Interest Disclosure Policy](#)

- 6.3 ***What if you are a victim of bribery or corruption?*** In the event that you are a victim of bribery or corruption (e.g. you are approached about a bribe or offered a bribe) then it should immediately be notified to Chief Operating Officer in confidence. Where this is not possible or appropriate then it can be raised through the procedure for [Whistleblowing/Public Interest Disclosure](#).
- 6.4 ***Protection*** – where a bribery or corruption-related concern is reported in good faith, typically in the circumstances of 9.1. or 9.2 above, then LSHTM will afford appropriate protection to the reporter, provided that the report has been made in good faith.
- 6.5 ***Investigation process*** – any bribery or corruption-related investigations will be undertaken in accordance with the process detailed in Section 7 below.. The decision to involve the police and/or other external organisations (such as the Serious Fraud Office (SFO)) will be taken by the Chief Operating Officer in conjunction with the Chair of the Audit & Risk Committee. Clearly, in some circumstances the decision to involve the police or other authorities will not rest with LSHTM e.g. should LSHTM ever be implicated in an ongoing police investigation.
- 6.6 ***Self-reporting*** – this refers to the situation where an organisation becomes aware that an offence under the Bribery Act may have been committed, and must decide if the scale and circumstances warrant reporting to the relevant authorities, typically the SFO or Office of Fair Trading (OFT). The formal decision to self-report, where that is an option for LSHTM, will be taken by the Chair of the Audit & Risk Committee in conjunction with appropriate internal and external advisers.

7 FRAUD RESPONSE PLAN

7.1 Purpose

- 7.1.1 The purpose of this plan is to define authority levels, responsibilities for action and reporting lines in the event of a suspected fraud or financial irregularity, including bribery and corruption). The use of the plan should allow LSHTM to:
- Respond quickly and professionally to any suspicion or suggestion of fraud or irregularity
 - Prevent further loss
 - Establish and secure evidence necessary for criminal or disciplinary action
 - Notify the office for students, other regulators or funders if appropriate
 - Minimise and recover losses
 - Take appropriate action against those who have committed the fraud
 - Deal with requests for references for employees disciplined or prosecuted for fraud
 - Review the reasons for the incident, the measures taken to prevent a recurrence, and any action needed to strengthen future responses to fraud

- Keep all persons with a need to know suitably informed about the incident and LSHTM's response
- Assign responsibility for investigating the incident
- Establish circumstances in which external specialists should be involved; and,
- Establish circumstances in which the police should be notified and the lines of communication with the police.

7.2 Initiating action

7.2.1 Suspicion of fraud or financial irregularity may be captured through a number of means, including the following:

- Requirements on all staff under the [Financial Regulations](#) to report fraud
- LSHTM's [Whistleblowing/Public Disclosure Policy](#)
- LSHTM's disciplinary policy ([academic/professional services](#))
- LSHTM's [research misconduct policy](#)
- Planned audit work
- Operation of proper management control and procedures
- Disclosure by individual(s)
- External reports to LSHTM

7.2.2 All actual or suspected incidents should be reported immediately to the LSHTM Fraud email address: FraudConcerns@lshtm.ac.uk either:

- In accordance with the [Financial Regulations](#), to the Chief Operating Officer,
- Or via the [Whistleblowing/Public Interest Disclosure Policy](#)

7.2.3 If the disclosure involves or implicates any of the individuals detailed above, then the disclosure should be made to the Director and Chair of Audit and Risk Committee or Chair of Council as appropriate (see contact details in section [X]).

7.2.4 As soon as practical, but ideally within 24 hours, a meeting should be convened normally consisting of the following **Fraud Group** to decide on the initial response:

- Chief Operating Officer
- Director of Finance
- Director of Human Resources
- Head of Governance
- Head of Legal and Compliance
- Other officers as deemed appropriate by the LSHTM Fraud Group chair. For example, Unit Chief Operating Officers may need to attend meetings if the fraud occurs and/or impacts the Units

- 7.2.5 It may also be necessary to involve colleagues in Communications and Engagement if there is a potential for reputational damage/media reporting or any other appropriate member of staff.
- 7.2.6 The Fraud group will decide:
- whether an investigation is required
 - who should lead the investigation
 - who should undertake the investigation and the composition of any project group set up to coordinate the investigation
 - whether and at what stage internal audit need to be involved in the investigation
 - whether the individual needs to be suspended; and
 - whether the matter should be reported to the police.
- 7.2.7 The Chair of the Audit and Risk Committee should be advised at the earliest possible time that an investigation is taking place and of the planned approach toward undertaking the investigation.

7.3 Prevention of further loss

- 7.3.1 Where the initial investigation provides reasonable grounds for suspecting a member/members of staff of fraud, the Fraud group will decide how to prevent further loss. This may require the suspension of the individual(s) suspected of fraud and removal of physical and systems access rights. It may be necessary to plan the timing of suspensions to prevent individuals from destroying or removing evidence that may be needed to support the investigatory process.
- 7.3.2 Suspension will be in accordance with LSHTM's Disciplinary Policy ([academic/professional services](#))
- 7.3.3 Colleagues in Security and Human Resources should advise on the best method of denying access to property, while individuals remain suspended. Similarly, the Director of IT should be instructed to withdraw, without delay, access permission to LSHTM's computer systems.
- 7.3.4 The Chief Operating Officer and/or the Internal Auditor shall consider whether it is necessary to investigate systems other than that which has given rise to suspicion, through which the individuals/respondents may have had opportunity to misappropriate LSHTM's assets.

7.4 Establishing and securing evidence

- 7.4.1 LSHTM will follow established disciplinary procedures against any member of staff who has committed fraud. LSHTM will normally pursue the prosecution of any such individual.
- 7.4.2 Internal Audit or those investigating the incident will:

- maintain familiarity with LSHTM’s disciplinary procedures, ensure that evidence requirements will be met during any fraud investigation
- obtain approval from LSHTM’s management team prior to establishing and maintaining contact with the police; and
- ensure that staff involved in fraud investigations are familiar with and follow rules on the admissibility of documentary and other evidence in criminal proceedings.

7.5 Notify the Office for Students and funding bodies

- 7.5.1 The circumstances in which LSHTM must inform the Office for Students about actual or suspected frauds are detailed in the [terms and conditions of funding for higher education institutions](#).
- 7.5.2 LSHTM is required to report all material fraud or irregularity to the Office for Students.
- 7.5.3 The Head of Governance is responsible for informing the Office for Students of any such incidents.
- 7.5.4 The requirements for informing funders about suspected or actual frauds are specific to each funder. The Head of Strategic Research is responsible for informing funders about such incidents.

7.6 Recovery of Losses

- 7.6.1 Recovering losses is a key objective of any fraud response investigation. Internal Audit or those investigating the incident should ensure that in all fraud investigations the amount of any loss is quantified. Repayment of losses should be sought in all cases.
- 7.6.2 Where the loss is substantial (e.g. meets Office for Students reportable event thresholds), legal advice should be obtained without delay about the need to freeze an individual’s assets through the courts pending conclusion of the investigation. Legal advice should also be sought about the prospects for recovering losses through the civil court, where the perpetrator refuses repayment. LSHTM would normally expect to recover costs in addition to losses.
- 7.6.3 LSHTM should also liaise with its insurers about a potential claim, even if the perpetrator is being pursued for recovery.

7.7 References for employees disciplined or prosecuted for fraud

- 7.7.1 It is a requirement that any request for a reference for a member of staff who has been disciplined or prosecuted for fraud shall be referred to HR. HR shall prepare any answer to a request for a reference having regard for employment law.

7.8 Reporting to Council

- 7.8.1 Any material alleged incident shall be reported without delay to the Director, and to the Chairs of both Council and the Audit and Risk Committee.
- 7.8.2 The Chief Operating Officer will make a judgement as to what is considered material as this will be impacted by both the value, the nature of the incident (e.g. theft, misreporting of financial information) and the role of the alleged perpetrator (i.e. the Finance Director or a Project Administrator).
- 7.8.3 Any variation from the approved fraud response plan, together with reasons for the variation, shall be reported promptly to the Chief Operating Officer (if not already involved) and to the chairs of both the Council and Audit and Risk Committee.
- 7.8.4 On completion of the investigation the Fraud Group will submit to Audit and Risk Committee a report containing:
 - a description of the incident, including the value of any loss, the people involved and the means of perpetrating the fraud
 - the measures taken to prevent recurrence
 - any action needed to strengthen future responses to fraud with follow up report on whether the actions have been taken.

7.9 Reporting lines during the Investigation

- 7.9.1 The Fraud Group (as outlined in [7.2.4] above) shall provide a confidential report to the Chair of Council, the Chair of Audit and Risk Committee, the Director, and the Internal and External Auditors at an agreed frequency. The scope of the report shall include:
 - The circumstances surrounding the case and contributing factors
 - Progress with the investigation; and,
 - An estimate of resources, time and actions required to conclude the investigation.

7.10 Review of Fraud Response Plan

- 7.10.1 This plan will be reviewed annually for minor amendments and every three years for major review. All future changes to this policy should be reported to Audit and Risk Committee.
- 7.10.2 If any suspected fraud directly involves a member of staff directly referred to in this document then that person should be replaced by their line manager.

8 APPENDICES

8.1 Appendix 1 – Contacts

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| Responsible Officer – Chief Operating Officer | Matt Lee | Matt.lee@lshtm.ac.uk |
| Director | Liam Smeeth | Liam.smeeth@lshtm.ac.uk |
| Chair of Council | Don Robert | Don.robert@lshtm.ac.uk |
| Chair of Audit and Risk Committee | Hitesh Patel | Hitesh.patel@lshtm.ac.uk |
| Whistleblowing contact – Interim Secretary to Council | Jocelyn Prudence | Jocelyn.prudence@lshtm.ac.uk |
| Head of Governance & Risk | Ayisha Govindasamy | Ayisha.govindasamy@lshtm.ac.uk |
| Head of Legal and Compliance | Alex Hollander-Carney | Alex.hollander@lshtm.ac.uk |

8.2 Appendix 2 – ‘Red Flag’ risk scenarios relevant to Higher Education Institutions (HEIs)

- 8.2.1 For the most part, ‘Red Flag’ risk scenarios relevant to LSHTM will be the same as those affecting most organisations. However, there are some – typically related to overseas work, donations and student recruitment - that are largely reserved to the education sector.
- 8.2.2 Some scenarios - such as a donation - when considered in isolation may *seem* perfectly acceptable. However, when that donation coincides with the donor tendering for a contract or the donor’s child applying for a place at LSHTM then, clearly, this presents a different scenario and risk.
- 8.2.3 Clearly, for this reason it is imperative that such issues are considered across LSHTM on a fully ‘joined-up’ basis.
- 8.2.4 Whilst it is accepted that the following risk scenarios are central to the activities of LSHTM, nonetheless the associated bribery and corruption risks should not be underestimated:
- Any procurement-related activity
 - Supplier relationships which involve significant or frequent hospitality or where hospitality is expected from potential/new suppliers
 - Invoicing issues, including agent fees, cash payments, disproportionate costs and ‘dubious’ expenses
 - Payments for travel, hospitality, gifts and entertainment - particularly overseas
 - Overseas field trips involving potential ‘facilitation’ payments to customs officials and others, typically, in order to speed things up or to gain access

- Facilitation payments to expedite overseas building, building permissions and access to utilities
- Overseas agents and brokers, particularly where student enrolment is involved
- Overseas campuses
- Donations
- Student recruitment
- Examination results and associated processes
- Concerns - which would clearly need to be substantiated - over lavish hospitality, unnecessary foreign travel and entertainment linked to (apparently) legitimate business travel.

8.3 Appendix 3 – Declaration of Understanding form - Template

The following declaration is completed by all staff when they join LSHTM.

DECLARATION OF UNDERSTANDING OF LSHTM'S ANTI-FRAUD, BRIBERY & CORRUPTION POLICY

I confirm that I have read and understood the requirements of LSHTM's Anti-Fraud, Bribery & Corruption and Bribery Policy and my responsibilities in relation to this document.

I understand that if I am party to any breach of the Policy then it could be regarded as Gross Misconduct and that this may result in disciplinary action, up to and including dismissal, in accordance with LSHTM's disciplinary procedures

Signed:

Name:

Position:

Date: