Anti-Bribery and Anti-Corruption Policy

Version 1.0

3 November 2026

Ollscoil Teicneolaíochta an Oirdheiscirt
South East Technological University

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[1] Internal consultation with other departments within the University should be noted

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Feedback or issues arising on implementation of this policy should be communicated to the policy author.	
Policy Author:	Corporate Compliance & Risk Manager

Policy Management Framework Compliance Review as requested by EMT all draft policies should be reviewed by the Policy Review Group[3] in advance of review by EMT. Please confirm that the policy was reviewed by the policy review group.	
Date Policy Reviewed:	18 September 2025

[3] Contact susan.green@setu.ie

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1. Introduction/Context

South East Technological University (SETU) is committed to the highest possible standards of openness, probity and accountability. The University promotes a culture of integrity, transparency, accountability and vigilance. SETU recognises the importance of protecting the University, its assets, its reputation, its staff and stakeholders from the consequences of bribery and corruption activities.

The University expects the highest standards of ethical behaviour from all University staff, students, vendors, contractors, customers and other stakeholders who interact with, or transact business with, the University. SETU has put in place a wide range of policies, regulations, procedures and codes of practice to deliver on its commitment to protect the University and to deter malpractice, abuse and wrongdoing.

The Anti-Bribery and Anti-Corruption Policy (the Policy) sets out a process by which staff, students and Governing Body can report bribery and corruption or suspected bribery and corruption.

2. Purpose

The purpose of this Policy is to promote a zero-tolerance approach to bribery and corruption and to safeguard the University by ensuring opportunities for bribery and corruption are minimised. This Policy is informed by, and cognisant of, existing University policies.

The University considers that all forms of bribery and corruption have a detrimental impact, undermine governance and damage the reputation of the University. This Policy sets out the responsibilities and procedures to follow for members of staff, students and Governing Body where bribery and/or corruption or suspected bribery and/or corruption has been identified.

3. Scope

This Policy covers bribery and corruption relating to all University controlled funds, activities and assets, including research grants, consultancy projects and subsidiary companies.

This Policy applies to all staff, researchers, students and members of Governing Body and Governing Body Committees. Staff means all employees and full and part time staff of the University. This Policy applies to activities inside and outside Ireland.

The Policy shall be published on the University website.

4. Principles

The general principle underlying this Policy is a requirement for all stakeholders to act with integrity, in compliance with this Policy and relevant University policies. Furthermore, to be vigilant with a view to protecting the University, the University community and University funds, activities and assets from the consequences of bribery and corruption activities.

5. Legislation

The Criminal Justice (Corruption Offences) Act 2018 primarily governs legal obligations with regard to bribery and corruption. Bribery and corruption are criminal offences. It is illegal to pay or offer to pay a bribe and/or to receive or agree to receive a bribe.

6. Definitions

For the purpose of this policy **Bribery** is an inducement or reward offered, promised or given in order to gain any commercial, contractual, regulatory or personal advantage. Generally, bribery is transactional, it involves an exchange of something of value to influence someone's actions.

Corruption is the misuse of power for personal gain and can be described as acting with an improper purpose personally or by influencing another person to do so, either directly or indirectly.

Corruption may occur for example as follows:

- By means of making a false or misleading statement.
- By means of withholding, concealing, altering or destroying a document or other information.
- By means of forging records, including electronic or digital records.
- By means of creating or misusing tools, including digital tools.
- By other means.

In an academic environment bribery and corruption could be used to bypass academic award, grant application, student support or procurement processes allowing fraudulent academic credentials, manipulated grant or student support applications, or biased bidding processes in procurement or contract award. It could also be used to bypass export licensing requirements, allowing the illegal movement of controlled items across borders.

Corruption can include the abuse of Artificial Intelligence (AI) systems to achieve personal benefit/advantage. For example, the use of AI based hyper-

realistic imitations of audio-visual content called deepfakes for novel fraud schemes.

Fraud, which is often evident with corruption and bribery, is usually deceit for personal gain (*add link to policy once available*).

7. Policy

7.1 It is University policy that staff, researchers, students and members of Governing Body and Governing Body Committees never offer, give, promise, provide, solicit, request, accept or agree to receive anything of value including payments with the expectation or purpose of gaining commercial, contractual, regulatory or personal advantage.

7.2 The University's position in relation to the giving or receiving of gifts or hospitality is set out in further detail in Section 3.3 of the Code of Conduct for Employees and Section 4.1 of the Code of Conduct for Governing Body Members.

7.3 It is University policy to investigate all cases of suspected bribery and/or corruption and, where appropriate, to pursue legal remedies available under the law.

7.4 Any act of bribery and/or corruption ascertained upon investigation, or pursuant of a criminal conviction, or through acknowledgement by the individual(s) concerned, shall result in the appropriate disciplinary and/or legal actions against them. This includes the possibility of termination of employment, expulsion in relation to students, restitution, and/or forwarding information to the appropriate authorities for criminal prosecution.

7.5 The University ensures that it complies with all mandatory reporting requirements under relevant legislation and the SETU Interim Code of Governance. For example, there may be a requirement to report a matter to An Garda Síochána and/or the Charities Regulator, as well as other relevant regulatory authorities including the Comptroller & Auditor General (C&AG), the Department of Further and Higher Education, Research, Innovation and Science (DFHERIS) and the Higher Education Authority (HEA).

8. Reducing the Potential for Bribery and Corruption

The University implements preventive measures, which include a system of

internal control, an effective risk management framework, internal audit and independent external annual audit to reduce the potential for bribery and/or corruption.

SETU staff with management or supervisory responsibilities should ensure that all members of staff in their department are aware of University policies and procedures and that these policies and procedures are adhered to at all times.

The University seeks to ensure that opportunities for bribery and corruption are reduced to the lowest possible level of risk, for example, through the following:

- Operating an effective system of governance and internal control, including controls in place in procurement, IT services and export controls.
- Promoting the necessity and requirement for high standards of personal conduct through the Code of Conduct for Employees, the Code of Conduct for Governing Body members and other relevant policies as published.
- Dissemination of policies, procedures and guidelines to members of the University community, including provision of associated training in many instances.
- Requiring compliance with University policies and procedures at all times.
- Implementing appropriate segregation of duties, delegating approval authority across a range of personnel and managing conflicts of interest.
- Promoting a culture of transparency including the application of procedures in accordance with the Protected Disclosures Policy ('whistleblowing policy') for those reporting allegations of wrong-doing.

9. Responsibility and Authority

Suspicions or allegations of potential bribery and/or corruption should be treated as confidential wherever possible. Discretion is advised regarding discussing suspicions of bribery and/or corruption with anyone inside or outside the University. Complaints can be made without fear of retribution except where the worker[4] has been complicit in the bribery and/or corruption. Where investigations are undertaken the principles of fair procedures and natural justice will apply.

9.1 Vice President Governance/University Secretary: The Vice President Governance/University Secretary is responsible for receiving reports of

[4] 'Worker' to align with definition as per the Protected Disclosure Policy and section 11.4 below.

bribery and/or corruption and facilitating, where required, an investigation.

9.2 **Management:** It is the responsibility of the Executive Management Team and Management to ensure adequate effective internal controls are in place and operating effectively, to promote a zero tolerance approach to bribery and/or corruption and to manage the risk of bribery and/or corruption.

It is the responsibility of all members of Management to:

- ❖ Be familiar with the types of bribery and/or corruption that might occur in their area.
- ❖ Be alert for any indication that improper activity, misappropriation or dishonest activity is or was in existence in their area.
- ❖ Carry out a risk assessment of any potential opportunities for bribery/corruption and put in place controls for the prevention and detection of bribery and/or corruption.

Management are required to support and work with the Executive Management Team and any other involved managers or law enforcement authorities in the detection, reporting and investigation of bribery and corruption including the prosecution of offenders.

If bribery and/or corruption is detected in a particular function, the relevant manager is responsible for taking appropriate corrective actions to ensure adequate controls exist to prevent reoccurrence of improper actions.

9.3 **Staff**: It is the responsibility of all staff to conduct University business in such a way as to prevent bribery and corruption occurring in the workplace. Staff must be alert to the possibilities for bribery and corruption and be on guard for any indications that improper or dishonest activity is taking place. See Appendix 1 for some examples of bribery and corruption in the context of a university.

Staff have a responsibility to report any suspicions of bribery and corruption to their manager, (or the Vice President Governance/University Secretary/a member of the Executive Management Team if the suspicion is in relation to the staff members direct line manager) without delay, according to the procedures detailed in Section 11.

9.4 All other stakeholders[5] including students: All members of the SETU community, including students, are expected to have high standards of personal integrity and honesty.

Students are responsible for:

- Adhering to the University's Student Code of Conduct and policies and procedures.

Allegations of potential academic misconduct e.g. plagiarism or cheating by students will be dealt with under the Student Academic Misconduct Policy and Disciplinary Procedures.

Allegations of potential breaches of examination rules or procedures that occur during an examination will be dealt with under the Academic Regulations for Taught Programmes and associated documents.

Allegations of potential breaches of the Student Code of Conduct will be dealt with under the Student Expected Behaviour Policy and Disciplinary Procedure.

All stakeholders are responsible for:

- The timely reporting of any deviation from this Policy and or suspicions of bribery and corruption.
- Full co-operation with any University investigation, audit or review.

10. Indicators of Bribery and/or Corruption

Indicators of bribery or corruption in a University context include undisclosed conflicts of interest, unexplained preferential treatment of suppliers or applicants or stakeholders (students/staff/others) or excessive gifts or hospitality[6]. Generally, the following are common indicators of bribery or corruption.

- Payments are for abnormal amounts or purposes.
- Payments are made in an unusual way.
- The usual processes for approval or sign-off are bypassed.
- Lack of adherence to procurement processes and guidelines.
- Individuals are secretive about certain matters or relationships and/or insist on dealing with them personally.
- Decisions are taken for which there is no clear rationale.
- Records are amended, altered, incomplete or missing.

[5] As per section 1 other stakeholders include students, vendors, contractors, customers and other stakeholders who interact with, or transact business with, the University.
[6] See also Section 6 for examples of bribery and corruption in the academic environment.

- ❖ There have been unauthorised or unusual system changes.
- ❖ There is evidence of unusual network traffic.

11. Reporting Procedures

11.1 Staff should report all cases of bribery and/or corruption or suspected bribery and/or corruption to their Head of Department/ Function or line manager/immediate supervisor without delay. A bribery and/or corruption Incident Report should be completed by the member of staff and/or their manager (see Appendix 2). On completion of such a report, the manager should notify the Vice President Governance/University Secretary and submit the report to them.

11.2 In circumstances where members of staff are unable to report the matter to their Head of Department / Function or line manager/immediate supervisor, they should themselves report the matter to the Vice President Governance/University Secretary. Where this is not possible, the report should be made to an alternative member of the Executive Management Team.

11.3 Students should report all cases of bribery and/or corruption or suspected bribery and/or corruption to the Head of Department in the first instance. If this is not possible, they should report the matter to the Head of Faculty, Vice President Academic Affairs, Teaching & Learning or to the Vice President Governance/University Secretary.

11.4 Those making a report should also be aware that the University has a Protected Disclosures Policy which is available here. If appropriate to do so an individual may alternatively use the Protected Disclosure Policy to disclose suspected bribery and/or corruption where it is deemed the incident falls under the definition of a "relevant wrongdoing" as defined in legislation[7] and outlined in the Protected Disclosure Policy. In this case the reporting of bribery and corruption may be investigated under the Protected Disclosure Policy. Investigations under the Protected Disclosure Policy will take precedence over any other internal investigations.

11.5 While non-anonymous reporting is preferred, the University will investigate anonymous reports and claims where supported by sufficient evidence to form the basis of an investigation.

11.6 Great care must be taken in dealing with suspected bribery and/or corruption activities to avoid:

- ❖ Incorrect accusations.
- ❖ Alerting suspected individuals to an investigation underway.

[7] **PROTECTED DISCLOSURES ACT 2014** REVISED Updated to 26 May 2025

- ❖ Contaminating evidence or obstructing any criminal investigation.
- ❖ Treating parties unfairly.
- ❖ Making statements that could lead to claims of false accusations or other charges.

11.7 In making a report, staff and students must take care to avoid making incorrect accusations or alerting suspected individuals. The good name and reputation of individuals, the subject of suspicion of bribery and/or corruption, is not undermined where an honest and reasonable report of suspicious circumstances is made. While the University welcomes the submission of all genuine reports, it will nevertheless view very seriously any false, malicious, frivolous or vexatious allegations that are made under this Policy. The University will regard such allegations as a serious offence which could result in disciplinary action.

11.8 A report will be acknowledged within 10 working days.

11.9 Any allegations of bribery and/or corruption made against a suspected individual will be communicated in writing to the relevant individual and they will be afforded the opportunity to reply to any formal allegation made against them.

11.10 All reporting of suspected bribery and/or corrupt activity is kept confidential where possible. There may be circumstances where confidentiality cannot be maintained due to the particular circumstances of the case. Should such a situation arise, SETU will make every effort to inform the individual who reported the activity that their identity may be disclosed.

11.11 It is important that all evidence is preserved and protected from the outset.

11.12 Investigations should only be undertaken with the explicit instructions of the Vice President Governance/University Secretary. The type of investigation will be determined by the Vice President Governance/University Secretary dependent on the circumstances, scale and complexity of the reported activity. The investigation may be carried out internally or externally as determined by the Vice President Governance/University Secretary.

11.13 A reasonable timeline dependent on the circumstances, scale and complexity of the reported activity and the type of investigation will be agreed and shared with interested parties.

11.14 Staff/students who are involved in an investigation shall be entitled to have a member of University staff, Student Union representative, or other appropriate individual, present during the course of any interview that is conducted in connection with the alleged bribery and/or

corruption activity with a view to supporting the employee/student or defending their case.

12. Records

Records associated with instances of bribery and corruption will be retained in accordance with the Data Protection Policy and the Data Retention Policy.

13. Reporting

An annual report will be provided to the Executive Management Team and to the Audit & Risk Committee, which will include an anonymised overview of any instances of bribery and corruption reported in the previous academic year. Confidentiality will be maintained to the greatest extent possible.

14. Relevant Policies

Staff, researchers, students and members of Governing Body and Governing Body Committees should ensure that they are familiar with other relevant University policies, procedures and regulations, including but not limited to:

- Anti-Fraud Policy.
- Protected Disclosure Policy.
- Staff Disciplinary Procedures.
- Code of Conduct Policy.
- Conflict of Interest Policy.
- Data Retention Policy.
- Hospitality and Entertainment Policy.
- Exports Control Policy.
- Policies and procedures issued by Finance, IT Services and Human Resources departments.

Students should ensure that they are familiar with other relevant University policies, procedures and regulations, including but not limited to:

- Academic Regulations for Taught Programmes and associated documents.
- Student Academic Misconduct Policy and Disciplinary Procedure.
- Student Expected Behaviour Policy and Disciplinary Procedure.
- Dignity and Respect Policy for Students.
- Student Complaints Policy.
- Protected Disclosure Policy.
- Conflict of Interest Policy.
- Export Controls Policy.

15. Implementation and Monitoring

The Vice President Governance/University Secretary is responsible for the implementation and monitoring of compliance with this Policy.

16. Compliance

It is expected that all staff of the University and all members of the University community will comply with this policy.

17. Useful Links

Policies page

Criminal Justice (Corruption Offences) Act 2018

Protected Disclosures Policy and Processes

18. Review of Policy

This policy will be reviewed in advance of the review date i.e. day month year, and/or as soon as possible following new or updated legislation, national or sectoral policy.

19. Policy Author

The author of this policy is the Corporate Compliance & Risk Manager. Any feedback or issues arising on implementation of this policy should be communicated to the policy author. They are responsible to ensure that the Policy Owner is aware of these comments when reviewing the policy.

20. Appendices

Appendix 1 Responsibilities

Appendix 2 Incident Reporting form

Appendix 1: Responsibilities

Responsible Person	Roles
Vice President Governance/University Secretary & The Governance Unit	● Review, monitor and distribute the policy and to promote awareness as required.
Audit & Risk Committee or Finance & Capital Investment Committee in line with Committee Terms of Reference	● Review the Policy and recommend to Governing Body for approval. ● Monitor matters arising under this policy and report to Governing Body.
Governing Body	● To review and approve the policy at least every 3 years on recommendation of Audit & Risk Committee.
President	● Ensure processes and procedures are in place within the University to facilitate adherence to the policy.
Vice President Governance/University Secretary	● Ensure instances of alleged or suspected bribery and/or corruption reported to them are investigated appropriately.
Senior Vice Presidents, Vice Presidents, Deans, and Heads of Faculty	• Monitor Compliance with the Policy.
Management or Supervisory Positions	● Monitor Compliance with the Policy; ● Ensure that all members of staff in their department are aware of University policies and procedures and that these policies and procedures are adhered to at all times.
All Staff, Students	● Adhere to the policy statements in this document; ● Staff to report suspected breaches of the policy to the Vice President Governance/University Secretary. ● Students to report suspected breaches of the policy to the Head of Faculty or the Vice President Academic Affairs, Teaching & Learning

Appendix 2 Incident Report Form

Anti-Bribery & Anti-Corruption Policy – Incident Report From	
"What Happened" ? Incident Capture	
Incident*:	
Statement*: (Brief description of incident)	
Situation/Incident Date*:	
Raised by*:	
Person making the report*:	
Date of Report*:	
Impact	
Details of incident known to date*[8]	
❖	
❖	
❖	
Other Notes	

*Compulsory fields

[8] Brief summary only.