Cardiff Academy

POLICY /// GOVERNANCE AND CORPORATE

Anti-Bribery, Corruption and Fraud Policy

Cardiff Academy's zero-tolerance approach to bribery, corruption and fraud, including in student recruitment, agent commissions, admissions, assessment and dealings with sponsors and officials, with rules on gifts and hospitality and how to report concerns.

REFERENCE	**CA-GOV-05**	VERSION	**1.0 (Approved)**
POLICY OWNER	**Chief Financial Officer**	APPROVED BY	**Board of Governors**
ISSUE DATE	**October 2026**	APPROVAL DATE	**October 2026**
REVIEW CYCLE	**Annual**	NEXT REVIEW DUE	**October 2027**
APPLIES TO	**Board, all staff, contractors, education agents and other associated persons**	PUBLISHED	**Website; staff portal; included in agent and supplier contracts**

RELATED POLICIES CA-GOV-07 Conflict of Interest; CA-GOV-10 Whistleblowing; CA-GOV-12 Education Agent Recruitment and Management; CA-ACA-05 Academic Integrity; CA-HR-02 Staff Code of Conduct

LEGAL ENTITY Cardiff Education Group Ltd, trading as Cardiff Academy (Company No. 14569122). Registered office: 168 City Road, Cardiff CF24 3JE. Teaching premises: 8 Drake Walk, Cardiff CF10 4LG

1 Policy statement

Cardiff Academy does not tolerate bribery, corruption or fraud in any form. We will conduct our business honestly, fairly and transparently in the UK and overseas, and we expect everyone who works for us or on our behalf to do the same. This applies whatever local custom or practice may be.

2 Scope

This policy applies to directors, governors, employees, temporary and agency staff, contractors, consultants, education agents, sub-agents and any other person who performs services for or on behalf of the Academy ("associated persons").

3 Definitions

- **Bribery:** offering, promising, giving, requesting, agreeing to receive or accepting a financial or other advantage intended to induce or reward the improper performance of a function or activity.
- **Facilitation payment:** a small unofficial payment to speed up a routine government action (for example a visa or document process). Facilitation payments are bribes and are prohibited.
- **Fraud:** dishonestly making a false representation, failing to disclose information, or abusing a position, to make a gain or cause a loss.
- **Corruption:** the abuse of entrusted power for private gain.

4 Prohibited conduct

Associated persons must not:

- offer, give, request or accept any bribe or facilitation payment
- offer any advantage to a university, government or sponsor official, or an examination or accreditation body, to influence a decision
- accept money, gifts or favours from applicants, students, parents or agents in return for an offer, a place, a CAS, a mark, a grade, a reference, an attendance record or any other decision
- produce, alter or knowingly accept false documents (transcripts, English test results, financial evidence, passports, attendance records, certificates)
- pay commission to an agent other than under a signed agent agreement, at the agreed rate, to a business bank account in the agent's name, for a student who has enrolled
- conceal, falsify or destroy records to hide wrongdoing
- retaliate against anyone who refuses to take part in bribery or fraud or who reports a concern

5 High-risk areas and controls

Area	Risk	Controls
Recruitment through agents	Agents bribing officials or applicants; fraudulent applications; inflated commission	Due diligence before appointment; signed contract with anti-bribery clauses; commission only on enrolled, fee-paying students; commission paid only to verified business accounts; annual performance and compliance review; right to audit and terminate
Admissions and CAS	Payment for an offer or CAS; false documents	Admissions decisions by trained staff applying published criteria; document verification; two-person check before CAS issue; refusal rate monitored by the Compliance Group
Assessment and certification	Payment for marks; impersonation; certificate fraud	Anonymous marking where possible; moderation; ID checks in exams; secure certificate stock and verification service; CA-ACA-05
Scholarships and discounts	Favouritism or kickbacks	Published criteria; panel decisions recorded; CFO approval
Procurement	Kickbacks; conflicts of interest	Competitive quotes for significant purchases; declarations of interest; separation of ordering and payment

Area	Risk	Controls
Sponsors and government bodies	Improper inducements to win contracts	Gifts and hospitality rules; CEO approval of any hospitality to officials
Finance	Misappropriation, false invoices, payment diversion fraud	Segregation of duties; authorisation of significant payments by a second senior manager; verbal verification of any change to supplier bank details; monthly reconciliations

6 Gifts and hospitality

- Gifts and hospitality must be reasonable, proportionate, given openly, not in cash, and never linked to a decision.
- Staff may accept small tokens of appreciation of modest value from students (for example at the end of a course).
- Any gift or hospitality of more than modest value received or given, or any offer from an applicant, agent or supplier currently involved in a decision, must be declared within five working days in the **Gifts and Hospitality Register** held by the CFO.
- Staff involved in admissions, assessment or agent management must not accept any gift from an applicant, agent or parent while a decision is pending.
- Cash or cash equivalents (vouchers, transfers) must never be accepted.

7 Due diligence on third parties

Before entering into a relationship with an agent, sub-contractor, sponsor or partner, the Academy carries out proportionate due diligence: company and identity checks, references, sanctions screening where relevant, and a review of reputation and any adverse information. Contracts include anti-bribery, anti-fraud and modern slavery clauses, audit rights and termination rights.

8 Reporting concerns

Anyone who suspects bribery, corruption or fraud must report it immediately to the CFO or, if the concern involves the CFO, to the CEO or the Chair of the Board. Staff may also use **CA-GOV-10 Whistleblowing Policy**. Students, parents and agents may report concerns to **enquiries@cardiffacademy.co.uk**. Concerns will be investigated promptly and confidentially. Where appropriate the Academy will report matters to the police, Action Fraud, UKVI, partner universities or other relevant authorities.

9 Consequences

Breach of this policy by staff will be treated as gross misconduct and may lead to dismissal. Breach by an agent or contractor will lead to termination of the contract. The Academy will cooperate fully with any criminal investigation.

10 Training and communication

All staff receive anti-bribery and fraud awareness training at induction and every two years, with additional training for admissions, finance and agent management staff. Agents receive briefing on this policy as part of their onboarding and annual review.

11 Monitoring

The CFO reviews the Gifts and Hospitality Register quarterly and reports to the SLT. The Compliance Group reviews agent commission payments, refusal rates and document-fraud cases each month. The Board receives an annual report on fraud and bribery risks and incidents.

Compliance mapping

This policy has been written to meet, and to evidence, the following external requirements. Inspectors and university partners can use this table to locate the relevant provisions.

ISI Educational Oversight (PFE) standards	Standard 48 (appropriate policies and sound financial management); Standard 46 (proper relationship between proprietor and senior staff)
British Council Accreditation UK criteria	M8 (HR policies made known to staff); M21 (accurate publicity)
UKVI Student sponsor guidance	Sponsor duties – honesty and integrity; not issuing CAS on the basis of false documents; agent oversight
University partner due diligence	Partner due diligence – Bribery Act 2010 compliance; agent commission controls; anti-fraud measures
Legislation and statutory guidance	Bribery Act 2010 (including section 7 offence of failing to prevent bribery and "adequate procedures"); Fraud Act 2006; Economic Crime and Corporate Transparency Act 2023 (failure to prevent fraud); Proceeds of Crime Act 2002; Money Laundering Regulations 2017 (where applicable); Criminal Finances Act 2017 (failure to prevent facilitation of tax evasion)

Document control

Version	Date	Author / reviewer	Summary of changes
0.9	Pre-2026	Various	No equivalent Cardiff Academy policy
1.0	October 2026	Chief Financial Officer	New policy written for university partnerships, ISI Educational Oversight and British Council Accreditation UK. Supersedes all previous versions.

APPROVED ON BEHALF OF THE BOARD	SIGNATURE	DATE

Chair of the Board of Governors		