



**Higher Education Services  
Anti-Bribery and Corruption  
Policy**

**October 2025**

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# Higher Education Services Anti-Bribery & Corruption Policy

## 1.0 Introduction

**1.1** FutureLearn conducts its business in a legal and ethical manner. We do not tolerate, permit, or engage in bribery, corruption, or improper payments of any kind in our business dealings, in the UK or anywhere else in the world, both with public officials and people in the private sector.

**1.2** FutureLearn officers, employees and other members of FutureLearn (referred to in this Policy as “staff”) must act with honesty and with integrity, and comply with this Policy, our procedures and applicable laws at all times during the course of carrying out business and regardless of their seniority.

**1.3** We expect our business partners, customers, suppliers and those who perform services for, or on, our behalf (referred to in this Policy as “associated persons”) to adopt and adhere to the principles of this Policy, and to have equivalent standards and policies in place.

**1.4** This Policy requires that staff must not either directly or indirectly:

- Offer, promise, give, solicit or accept any bribe, either in cash or any other form of inducement, to or from any person or company, wherever they are located and whether they are a public official or body, or private person or company.
- Gain or retain any commercial, contractual or regulatory advantage through unethical or illegal means when conducting business on behalf of FutureLearn or its subsidiaries.
- Assist or facilitate the above conduct in any way.

**1.5** Staff and associated persons must understand and strictly comply with UK anti-bribery laws – principally the UK Bribery Act 2010 - regardless of where business is being conducted.

## 2.0 What is Bribery?

**2.1** Bribery is a criminal offence in most countries in the world, and the penalties for committing bribery offences can be severe including periods of imprisonment and unlimited fines.

**2.2** The UK’s Bribery Act 2010 is one of the most comprehensive anti-bribery laws in the world. It applies to UK incorporated businesses and UK nationals and also to any acts amounting to a bribery offence that occur in the UK. Importantly the Bribery Act can also apply to acts of bribery by UK nationals and businesses outside of the UK, and UK businesses can be held criminally liable in the UK for failing to prevent bribery in and outside of the UK by its associated persons. Even if paying a bribe is a customary practice in another jurisdiction, this is not a defence under UK law.

**2.3** An ‘associated person’ is someone who provides services to FutureLearn or acts on FutureLearn’s behalf and could be an employee of any type, consultants, agents and other forms of intermediaries and subsidiaries. Undergraduate and postgraduate students are not normally considered as associated persons, unless they are themselves contracted by FutureLearn to provide a service. However, research students are likely to be considered as associated persons in respect of the conduct of their research and for activities such as fieldwork.

**2.4** Acts of bribery or corruption are typically designed to influence an individual in the performance of their duties and to act in a way contrary to how their employer, their organisation or the public would expect them to act. Corruption is the misuse of public office or a business position for private gain. Committing an act of bribery or corruption is a criminal offence.

**2.5** A bribe is the offer, promise or giving of a financial or other advantage with the intention of inducing another person to do something improperly in carrying out work or performing a public function, or to reward that person for doing so. A bribery offence is also committed if a business or individual requests, agrees to accept or receives a financial or other advantage intending that work or a public function will be carried out improperly as a result. It is also an offence to offer, promise or give a financial or other advantage to someone (or to request or receive) when a business or individual knows or believes that acceptance of the advantage is in itself improper, for example because the relevant rules of that persons' employment prohibit them from accepting gifts in the context of their employment.

**2.6** Bribes usually take the form of improper payments or personal commissions. They can, however, take on many different shapes and forms, such as gifts, excessive hospitality, job offers, loans, holidays, the carrying out of works for an individual in a personal capacity, reimbursement of travel and other expenses and improper charitable or political donations.

**2.7** It is not necessary for a bribe to be paid or for an improper act to happen for wrongdoing to occur. Those offering, promising, or requesting a bribe can commit criminal offences.

**2.8** Bribery also includes "*facilitation*" or "*grease*" payments, which are typically small unofficial payments paid to speed up an administrative process or secure a routine government or local authority action by an official. Facilitation payments are more common outside of the UK, but it is possible that they could arise in the UK. Facilitation payments are treated as bribes by the Bribery Act and are prohibited by this Policy.

**2.9** FutureLearn can also be criminally liable for failing to prevent bribery. This means FutureLearn can be guilty of an offence if bribes are offered, promised or paid by an associated person in order to win or retain business or an advantage in business. FutureLearn has a defence to this criminal offence if it can demonstrate that it had adequate procedures in place to prevent bribery, and this Policy forms part of these procedures.

### **3.0 Policy Principles**

**3.1** This Policy applies to all of FutureLearn's activities and operations, and to all of its dealings and negotiations with third parties in all countries in which its staff and associated persons operate. All associated persons working on behalf of, under contract from or in collaboration with any part of FutureLearn or with its staff are expected to comply with the principles of this Policy. This includes sales agents as appropriate.

**3.2** FutureLearn has a zero-tolerance approach to bribery and corruption and as such, all forms of bribery and corruption are prohibited. A bribe does not actually have to take place; just promising to give or agreeing to receive a bribe is prohibited.

**3.3** FutureLearn will address risks of bribery by ensuring adequate and proportionate measures are developed and implemented to mitigate them. Staff must comply with FutureLearn's anti-bribery and corruption compliance measures and procedures.

**3.4** Arrangements with third parties will be subject to clear contractual terms, including specific provisions requiring them to comply with minimum standards and procedures relating to bribery and corruption. FutureLearn will not engage, or continue business with, any individual or third party who it knows or reasonably suspects of engaging in bribery or corruption.

**3.5** No staff member or associated person will suffer penalty or other adverse consequences for refusing to pay bribes even if a refusal may result in loss of business or a delay in proceedings.

**3.6** The prevention, detection and reporting of bribery are the responsibility of all staff. They should raise any concerns or allegations of bribery or corrupt activity with the FutureLearn Legal Team or the Finance Director.

**3.7** FutureLearn will ensure it takes appropriate action in response to any reported incidents of bribery or corruption. Investigations of bribery or corrupt activity will follow the principles and procedures set out in Anti-Fraud Policy. Failure to comply with this Policy will lead to disciplinary action and proven allegations will lead to disciplinary action resulting in summary dismissal. In relevant cases the police and the Serious Fraud Office (SFO) will be informed as certain offences carry criminal liability for individuals concerned and sanctions include significant fines and/or imprisonment.

## **4.0 Proportionate Procedures**

**4.1** FutureLearn will ensure it has procedures in place to prevent bribery by staff and associated persons which are proportionate to the bribery risks it faces and to the nature, scale and complexity of FutureLearn's activities.

## **5.0 Risk Assessment**

**5.1** The Finance Director is responsible for ensuring risks are assessed and appropriate action taken to comply with this Policy, including reporting the identified risks and the implementation of actions within their Business Plans.

## **6.0 Due Diligence**

**6.1** FutureLearn will apply due diligence procedures, taking a proportionate and risk-based approach, in respect of persons and organisations that perform or will perform services for or on behalf of FutureLearn in order to mitigate identified bribery risks.

**6.2** Where appropriate, line managers or their nominee will complete sufficient due diligence when entering into arrangements with others to ensure they are not acting corruptly and to periodically monitor their performance to ensure ongoing compliance. They will take appropriate action in response to any information uncovered as a result of due diligence which gives rise to concern and report any such actions to a member of the senior management team.

## **7.0 Communication**

**7.1** FutureLearn ensures that its bribery prevention and associated policies and procedures are embedded and understood throughout the organisation through internal and external communication.

**7.2** Line managers or their nominee are responsible for ensuring the communication of FutureLearn's Anti-Bribery and Corruption Policy and other relevant policies to associated persons. Line managers will also monitor and review their procedures and action plans to ensure their suitability, adequacy and effectiveness in relation to this Policy and implement improvements as appropriate.

## **8.0 Top Level Commitment**

**8.1** This Policy is reviewed annually to ensure fitness for purpose and has the full support of the senior management of FutureLearn.

## **9.0 Useful References**

**9.1** [Bribery Act 2010 Guidance](#) published by the Ministry of Justice

**9.2** For staff who are members of professional bodies, their own codes of ethics with which they are required to comply.

## **10.0 Who to Contact**

**10.1** If you have any questions about anything in this Policy, please contact Bo Krysinski, Finance Director, using the following email: [bo.krysinski@futurelearn.com](mailto:bo.krysinski@futurelearn.com).