Anti-Bribery & Corruption Policy

Year 2025

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Section-1: Definitions

In this Policy Document, unless otherwise specified, or anything repugnant to the Statutes of National University of Modern Languages, the following expressions shall have the meanings as follows:

1.1 ***Academic staff*** - a member of the faculty of the university.
1.2 ***Administrative staff*** - a member of the administration.
1.3 ***Bribery*** - offering, promising, giving, or receiving anything of value to influence an official decision.
1.4 ***Conflict of Interest*** - a situation where personal interest interferes with official duty.
1.5 ***Corruption*** - abuse of entrusted authority for personal or institutional gain.
1.6 ***Faculty*** - a group of university departments concerned with a major division of knowledge.
1.7 ***Faculty member*** - a member of academic staff.
1.8 ***Facilitation Payments*** - unofficial payments made to expedite routine processes (strictly prohibited).
1.9 ***Paid grade manipulation*** - the act of offering, giving, soliciting, or receiving money, gifts, favors, or any undue advantage to influence the awarding, alteration, or recording of academic grades or evaluation outcomes.
1.10 ***Staff member*** - a member of academic or administrative staff.

Section-2: Policy

1 Purpose:

To establish a clear, enforceable framework to prevent, detect, and respond to bribery and corruption in all University activities, ensuring integrity in academic, administrative, financial, and external engagements.

2 Scope:

The policy applies to all staff (academic and administrative) members, students and researchers, vendors, contractors, consultants, partners, and any person acting on behalf of the University.

3 Policy Statement:

NUML prohibits direct or indirect bribery, kickbacks, commissions, facilitation payments, undisclosed conflicts of interest, and any conduct that compromises impartial decision-making.

4 Risk Areas (University Context)

Higher exposure areas include:

a. Procurement and Contracting
b. Financial Management and Transactions
c. Recruitment, Appointments and Promotions
d. Admissions, Examinations and Assessment
e. Research Funding, Grants and Consultancy
f. Affiliations, Partnerships and International Collaborations
g. Student Services, Certifications and Academic Records

5 Prohibited Practices

5.1 Bribery & Improper Payments

a. Cash, gifts, favors, or hospitality intended to influence decisions
b. Payments routed through third parties to conceal intent

5.2 Gifts & Hospitality Abuse

a. Excessive or inappropriate gifts[1]
b. Hospitality that creates obligation or bias

5.3 Procurement Corruption

a. Bid manipulation, insider information sharing
b. Vendor favoritism or kickbacks

5.4 Academic Misconduct with Financial Motive

a. Paid grade manipulation
b. Research data falsification for funding advantage

5.5 Conflict of Interest

[1] An inappropriate gift is any item, benefit, or hospitality that could reasonably be perceived as influencing, or intended to influence, an official decision or action; creates a sense of obligation; is offered during a decision-making process; is disproportionate in value or frequency; is personal in nature; or is provided in cash or cash equivalents. Such gifts are strictly prohibited.

a. Undisclosed relationships with vendors, candidates, or partners.

6 Acceptable Practices

a. Modest, customary hospitality[2] (properly declared and recorded)
b. Official gifts of nominal value with prior approval
c. Transparent collaborations approved through formal channels

7 Preventive Controls

NUML shall implement:

a. Segregation of duties in financial and procurement systems
b. E-procurement / transparent tendering (aligned with Public Procurement Regulatory Authority (PPRA) rules)
c. Mandatory conflict-of-interest disclosures (annual + case-based)
d. Gift and hospitality register
e. Vendor due diligence and blacklisting system
f. Regular ethics and compliance training
g. Audit trails and documentation controls

8 Reporting Mechanism

Individuals must report suspected violations through:

a. Internal Audit Office[3]
b. Designated Ethics/Compliance Officer
c. Formal complaint form or email
d. Whistleblowing channel

Anonymous reporting is permitted with sufficient detail/evidence.

9 Whistleblower Protection

a. Protection against retaliation
b. Confidential handling of reports
c. Disciplinary action against retaliators

10 Investigation Framework

a. Preliminary review within defined timelines
b. Formal inquiry by authorized committee / Internal Audit
c. Evidence-based findings with due process
d. Documentation for audit and legal purposes

11 Disciplinary and Legal Actions

Depending on severity:

[2] Modest, customary hospitality refers to reasonable and proportionate refreshments or meals provided in the normal course of official University business, consistent with accepted professional norms, and not intended to influence any decision. All such hospitality must be transparently declared, appropriately approved, and recorded in the University's Gift and Hospitality Register. Hospitality that is excessive, frequent, decision-linked, or creates a sense of obligation is strictly prohibited.

[3] For the purposes of this Policy, the Internal Audit Office refers to the designated University function responsible for independent review of financial, operational, and compliance matters, including examination of suspected fraud, bribery, corruption, and related irregularities.

a. Written warning or suspension
b. Termination of employment / contract
c. Financial recovery
d. Blacklisting of vendors
e. Referral to authorities (e.g., Federal Investigation Agency, National Accountability Bureau)

12 Third-Party Compliance

a. All vendors and partners must comply with NUML's Anti-Bribery and Corruption Policy, and any associated procedures, standards, and contractual requirements.
b. Anti-corruption clauses included in contracts.
c. Right to audit and terminate for violations.

13 Record Keeping

a. Maintain records of:
   - Gifts and hospitality
   - Conflict disclosures
   - Investigations and outcomes
b. All records shall be retained for periods consistent with applicable audit cycles, statutory requirements, and University regulations.

14 Roles and Responsibilities

Rector

a. Overall accountability

Registrar / Director Finance / Director ORIC

a. Ensure compliance in administration, finance, and research

Internal Audit / Compliance Function

a. Risk assessments, audits, and investigations

Finance Branch

a. Maintain appropriate financial controls, segregation of duties, and transaction records.
b. Ensure financial transactions are properly authorized, documented, and traceable.
c. Monitor financial transactions for unusual, unauthorized, or potentially fraudulent activity.
d. Support the investigation of suspected financial fraud, bribery, or corruption.
e. Ensure financial records are retained in accordance with applicable University, audit, and legal requirements.
f. Report suspected financial irregularities through the prescribed reporting mechanism.

Heads of Departments

- Implement controls and monitor compliance

All Employees

- Adhere to policy and report violations

15 Violation

Non-compliance with this Policy, including engagement in bribery, corruption, or related misconduct, may result in rejection, suspension, or termination of any associated activity, transaction, or approval, and shall constitute grounds for disciplinary action in accordance with University regulations. Where applicable, such violations may also lead to financial recovery, blacklisting of third parties, and referral to relevant law enforcement or regulatory authorities**.**

16 Policy Review

This policy shall be reviewed periodically, or as required by institutional, regulatory, or financial considerations.

Section-3: Complaint / Reporting Form

COMPLAINT / REPORTING FORM **Anti-Bribery & Corruption Policy**	
Section 1: Complainant Details *(Optional for anonymous reporting)*	
Full Name:	
CNIC/ID (*if applicable*)	
Designation/Status	☐ Employee ☐ Student ☐ Vendor ☐ Other: _____
Department/Organization	
Contact#	
Email id	
☐ **I wish to remain anonymous** (Note: *Anonymous complaints will be processed subject to sufficiency of information.*)	
Section 2: Nature of Complaint	
☐ Bribery (offering/accepting undue advantage) ☐ Corruption / Abuse of authority ☐ Procurement irregularity (bid rigging, favoritism) ☐ Conflict of interest (undisclosed) ☐ Gift / hospitality violation ☐ Academic misconduct with financial motive (e.g., paid grade manipulation) ☐ Financial fraud / misappropriation ☐ Other (*please specify*): _____	
Section 3: Details of the Incident	
Date of Incident	
Department/Location	
Person(s) involved (Name, designation, department - if known)	
Description of Incident: (Provide clear, factual details: what happened, how, and why you believe it is misconduct) _____ _____	

_____
_____
_____
_____
_____

Section 4: Evidence / Supporting Information

☐ Documents attached (emails, receipts, screenshots, etc.)
☐ Witness(es) available
☐ No documentary evidence available

Details of evidence or witnesses:
_____
_____
_____

Section 5: Prior Reporting (*if any*)

Have you reported this matter previously? ☐ Yes ☐ No
If yes:
Reported to (office/person)**:** _____
Date: _____
Outcome (*if any*)**:** _____
_____
_____

Section 6: Declaration

I hereby declare that the information provided is true and correct to the best of my knowledge and belief, and that this complaint is made in good faith without malicious intent.

Signature: _____ (*if not anonymous*)
Date: _____

Section 7: For Official Use Only

Complaint ID: _____
Date Received: _____
Received by: _____

Initial Screening
☐ Within scope of the Policy
☐ Requires additional information
☐ Outside scope (refer to: _____)

Action Taken

☐ Referred to Internal Audit

☐ Inquiry Committee constituted

☐ Closed (reason): _____

Assigned Officer: _____

Status: ☐ Open ☐ Under Review ☐ Closed

Important Notes

- All complaints will be treated confidentially to the extent possible.
- Whistleblower protection applies to reports made in good faith.
- Providing false or malicious information may result in disciplinary action
- Submit form to: Internal Audit Office (NUML**)**