Policy Title:	**ANTI-FRAUD, CORRUPTION AND BRIBERY POLICY**		
Custodial Office:	Registrar Office	Policy Number:	GU/SKM-R/2021-88/09
Policy Contact:	Registrar Office	Date Approved:	February 21, 2026
Approved By:	Academic Council	Date of Issue:	March 02, 2026
Related Documents:	GU Policy Manual	Next Review:	February 2027
Revision:	Every three years		

N.B: ***This policy may be amended at any time without prior notice. All revisions shall supersede any previous versions and shall take effect immediately upon approval.***

QUALITY ENHANCEMENT CELL

GREENWICH UNIVERSITY

1. Policy Statement

Greenwich University Karachi is committed to maintaining the highest standards of integrity, transparency, and ethical conduct in all academic, administrative, and financial activities. The University adopts a zero-tolerance approach towards fraud, corruption, bribery, and any form of dishonest conduct.

All members of the University community are expected to act honestly, fairly, and in the best interest of the institution at all times.

2. Purpose

This policy aims to:

- Prevent fraud, corruption, and bribery in all University operations
- Promote a culture of accountability and ethical behavior
- Establish clear procedures for reporting and addressing misconduct
- Safeguard University assets, reputation, and stakeholders

3. Scope

This policy applies to:

- All academic and administrative staff
- Students
- Consultants, contractors, vendors, and partners
- Members of governing bodies and committees

It applies to all University-related activities, both on-campus and off-campus.

4. Definitions

Fraud:
Any intentional act of deception to gain unlawful or unfair advantage (e.g., falsification of records, misuse of funds).

Corruption:
Abuse of entrusted power for personal or institutional gain.

Bribery:
Offering, giving, receiving, or soliciting anything of value to influence decisions improperly.

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5. Prohibited Practices

The following are strictly prohibited:

- Offering or accepting bribes, kickbacks, or facilitation payments
- Manipulation of procurement or recruitment processes
- Misuse or theft of University funds, assets, or resources
- Conflict of interest without disclosure
- Forgery or falsification of academic or administrative records
- Collusion with vendors or third parties

6. Gifts, Hospitality & Conflict of Interest

- Gifts or hospitality must not influence decision-making
- Any gift above a nominal value must be declared
- Staff must disclose any personal or financial interest in University dealings
- Acceptance of gifts from students, vendors, or stakeholders is restricted

7. Roles and Responsibilities

Management

- Ensure implementation and enforcement of this policy
- Establish internal controls and risk management systems
- Promote ethical culture across departments

Employees & Students

- Comply with this policy
- Report any suspected misconduct
- Avoid situations that may lead to conflicts of interest

Quality Enhancement Cell (QEC) / Internal Audit

- Monitor compliance
- Conduct periodic audits and risk assessments
- Recommend improvements

8. Reporting Mechanism (Whistleblowing)

The University has established a formal whistleblowing mechanism to report misconduct and wrongdoing.

This process ensures that:

- Any individual (employee, student, or external stakeholder) can report suspected fraud, corruption, bribery, or unethical practices
- Reports can be made through:
  - Head of Department / Line Manager
  - Registrar Office
  - Quality Enhancement Cell (QEC) / Internal Audit
- All complaints are handled with:
  - Confidentiality
  - Impartial investigation
  - Protection against retaliation

Anonymous reporting may also be facilitated where appropriate.

The University ensures that all reported cases are:

- Properly documented
- Investigated through a formal committee
- Resolved based on evidence and due process

Strict disciplinary actions, including termination and legal proceedings, may be taken against individuals found guilty.

9. Investigation Procedure

- All reports will be investigated promptly and fairly
- A formal inquiry committee may be constituted
- Evidence-based findings will be documented
- Legal authorities may be involved where required

10. Disciplinary Actions

Violation of this policy may result in:

- Warning or suspension

- Termination of employment/enrollment
- Legal action under applicable laws
- Recovery of financial losses

Fraud, corruption, and bribery are considered gross misconduct.

11. Risk Management & Internal Controls

The University will:

- Maintain strong financial and administrative controls
- Conduct regular audits and compliance reviews
- Implement transparent procurement and recruitment processes
- Use digital systems to reduce human manipulation

12. Awareness & Training

- Regular training sessions for staff and faculty
- Awareness campaigns for students
- Policy dissemination through official platforms

13. Policy Review

This policy shall be reviewed every **3 years** or as required by:

- Regulatory authorities (e.g., HEC Pakistan)
- Institutional governance requirements

14. Compliance

Failure to comply with this policy will be treated seriously and may result in strict disciplinary and legal consequences.

15. Conclusion

Greenwich University Karachi is committed to fostering a transparent, accountable, and ethical environment, ensuring that all operations reflect integrity and uphold the University's reputation as a leading higher education institution.