

Ministry of Higher Education and Scientific Research - Iraq

AlMaarif University College – Al Anbar Province – Iraq

Quality Assurance and Academic Accreditation Section



Anti-Bribery and Corruption Policy

Version 2 -2022

Issued Data: March 2021



1. Eligibility for On-Campus Housing at Al Maarif University College

Al Maarif University College is committed to upholding the highest standards of ethics and integrity in all its operations. We firmly stand against all forms of bribery and corruption. This policy provides clear guidelines to prevent, detect, and manage bribery and corruption risks within the college. All faculty members, staff, students, and partners are required to adhere strictly to this policy, ensuring compliance with all applicable laws and regulations. Our commitment to honesty and transparency is fundamental to our educational mission and institutional values.

2. Scope at Al Maarif University College

This Anti-Bribery and Corruption Policy applies to all employees, faculty members, students, contractors, consultants, and any other individuals or entities associated with Al Maarif University College. The policy covers all activities conducted under the college's name, including but not limited to academic, administrative, financial, and operational activities. It is applicable to all geographical locations where the college operates, ensuring that our commitment to ethical conduct is maintained consistently across all levels and areas of our institution.

3. Accommodation Types at Al Maarif University College

For the purposes of this Anti-Bribery and Corruption Policy at Al Maarif University College, the following definitions apply:

1. **Bribery:** The offering, giving, receiving, or soliciting of any item of value to influence the actions of an individual in a position of authority or trust. This includes, but is not limited to, cash payments, gifts, hospitality, favors, and employment opportunities.
2. **Corruption:** The abuse of entrusted power for private gain. It includes activities such as bribery, embezzlement, fraud, and extortion.
3. **Employee:** Any person employed by Al Maarif University College, including faculty, staff, temporary workers, and volunteers.
4. **Stakeholder:** Any individual or group that has an interest in the operations and decisions of Al Maarif University College, including students, parents, partners, suppliers, and government agencies.
5. **Third Party:** Any individual or organization that Al Maarif University College engages with or conducts business with, including but not limited to contractors, suppliers, service providers, and agents.



6. **Gift:** Any item of value given or received without payment or consideration, including but not limited to goods, services, loans, and discounts.
7. **Hospitality:** The provision of meals, entertainment, travel, lodging, and other forms of accommodation.
8. **Facilitation Payment:** A small payment made to expedite or secure the performance of a routine government action to which the payer is entitled.
9. **Conflict of Interest:** A situation in which a person's private interests interfere or appear to interfere with the interests of Al Maarif University College.
10. **Due Diligence:** The process of investigating and evaluating the background, reputation, and conduct of individuals or organizations before entering into a business relationship or transaction.

These definitions are intended to provide clarity and ensure a common understanding of key terms related to bribery and corruption. All members of Al Maarif University College are expected to familiarize themselves with these definitions and apply them in their daily activities and decision-making processes.

4. Prohibitions at Al Maarif University College

Al Maarif University College strictly prohibits the following actions and behaviors to ensure adherence to ethical standards and compliance with anti-bribery and corruption laws:

- 1) **Offering Bribes:** It is prohibited for any employee, faculty member, student, or associated person to offer, promise, or give any form of bribe, whether directly or indirectly, to any individual or entity with the intention of influencing their actions or decisions.
- 2) **Accepting Bribes:** It is prohibited to solicit, accept, or receive any form of bribe, whether directly or indirectly, from any individual or entity seeking to influence the actions or decisions of Al Maarif University College personnel.
- 3) **Facilitation Payments:** The college prohibits the making or accepting of facilitation payments. These are small payments made to expedite or secure the performance of a routine action by a government official or agency.
- 4) **Gifts and Hospitality:** Employees and associated persons must not offer or accept gifts, hospitality, or other benefits that could be perceived as influencing business decisions or compromising professional integrity. Modest gifts and hospitality may be accepted if they are customary, reasonable, and not intended to influence any decision.



- 5) **Conflict of Interest:** All employees and associated persons must avoid situations where personal interests conflict with the interests of the college. Any potential or actual conflicts of interest must be declared and managed appropriately.
- 6) **Embezzlement and Fraud:** Any form of embezzlement, fraud, theft, or misuse of the college's resources is strictly prohibited.
- 7) **Corrupt Practices:** Engaging in or facilitating corrupt practices, including but not limited to bribery, extortion, and abuse of power, is strictly prohibited.
- 8) **Retaliation:** Retaliation against any individual who reports a violation of this policy in good faith or participates in an investigation is strictly prohibited. The college is committed to protecting whistleblowers and ensuring that they can report concerns without fear of reprisal.

All members of Al Maarif University College are expected to adhere to these prohibitions and to report any suspected violations promptly. Failure to comply with this policy may result in disciplinary action, up to and including termination of employment or association with the college.

5. Responsibilities at Al Maarif University College

To ensure the effective implementation and compliance with the Anti-Bribery and Corruption Policy, the following responsibilities are assigned to various roles within Al Maarif University College:

1) Board of Trustees

- ❖ Provide oversight and ensure that the college adheres to the highest standards of ethical conduct.
- ❖ Approve and periodically review the Anti-Bribery and Corruption Policy.

2) College Leadership (Deans, Directors, and Department Heads)

- ❖ Promote a culture of integrity and ethical behavior within their respective areas.
- ❖ Ensure that all employees and students are aware of and comply with the Anti-Bribery and Corruption Policy.
- ❖ Monitor compliance and report any suspected violations to the appropriate authorities.

3) Compliance Officer

- ❖ Develop and implement procedures to prevent, detect, and respond to bribery and corruption.
- ❖ Provide training and resources to employees, students, and other stakeholders on anti-bribery and corruption practices.



- ❖ Conduct regular audits and risk assessments to identify potential areas of vulnerability.
- ❖ Investigate reported violations and take appropriate corrective actions.
- ❖ Maintain records of all reported incidents and the actions taken in response.

4) **Employees and Faculty Members**

- ❖ Familiarize themselves with the Anti-Bribery and Corruption Policy and adhere to its guidelines.
- ❖ Report any suspected incidents of bribery or corruption to their supervisor or the Compliance Officer.
- ❖ Participate in training sessions and stay informed about updates to the policy.

5) **Students**

- ❖ Understand and comply with the Anti-Bribery and Corruption Policy.
- ❖ Report any suspected incidents of bribery or corruption to a faculty member, supervisor, or the Compliance Officer.

6) **Contractors, Consultants, and Third Parties**

- ❖ Comply with the Anti-Bribery and Corruption Policy when conducting business on behalf of Al Maarif University College.
- ❖ Report any suspected incidents of bribery or corruption to their primary contact at the college or the Compliance Officer.

7) **Human Resources Department**

- ❖ Include anti-bribery and corruption clauses in employment contracts and third-party agreements.
- ❖ Ensure that all new employees receive training on the Anti-Bribery and Corruption Policy.
- ❖ Assist in the investigation of any reported violations of the policy.

Reporting and Whistleblowing

- Establish a secure and confidential reporting mechanism for employees, students, and third parties to report suspected violations of the Anti-Bribery and Corruption Policy.
- Ensure that whistleblowers are protected from retaliation and that their reports are handled with the utmost confidentiality.

Training and Awareness

- Provide regular training sessions for all employees, students, and relevant third parties to ensure understanding and compliance with the Anti-Bribery and Corruption Policy.
- Update training materials and resources regularly to reflect any changes in legislation or best practices.

By clearly defining these responsibilities, Al Maarif University College ensures a robust framework for preventing, detecting, and responding to bribery and corruption, thereby maintaining the highest standards of ethical conduct.



6. Reporting Mechanisms at Al Maarif University College

To ensure transparency and encourage the reporting of any suspected incidents of bribery and corruption, Al Maarif University College has established the following reporting mechanisms:

1) Confidential Reporting Channels

- ✓ **Email:** Employees, students, and third parties can report any suspected incidents by sending an email to a designated secure email address (e.g., info@uoa.edu.iq).
- ✓ **Hotline:** A dedicated telephone hotline is available for reporting concerns. This hotline is managed by the Compliance Officer and ensures confidentiality (e.g., 00964 7735544777 - 009647835544777).
- ✓ **Online Form:** A secure online form is available on the college's website for reporting incidents anonymously. The form allows for detailed descriptions of the issue and can be submitted without revealing the reporter's identity.

2) Whistleblower Protection

- The college ensures that all reports of suspected bribery and corruption are handled confidentially.
- Whistleblowers are protected from retaliation, discrimination, or any form of adverse action as a result of reporting in good faith.
- The identity of whistleblowers will be kept confidential to the fullest extent possible, consistent with the need to conduct a thorough and fair investigation.

3) Reporting Process

- **Initial Report:** When a report is received, it will be logged and assigned a unique reference number for tracking purposes.
- **Acknowledgment:** The Compliance Officer will acknowledge receipt of the report to the whistleblower, if contact information is provided.
- **Preliminary Assessment:** The Compliance Officer will conduct a preliminary assessment to determine if the report warrants a full investigation.
- **Investigation:** If warranted, a formal investigation will be initiated. This may involve interviews, document reviews, and collaboration with internal or external experts.
- **Findings and Actions:** Upon conclusion of the investigation, findings will be documented, and appropriate corrective actions will be taken. This may include



disciplinary action, process improvements, or reporting to external authorities if necessary.

- **Feedback to Whistleblower:** Where appropriate and feasible, the whistleblower will be informed of the outcome of the investigation.

3) Record Keeping

- All reports, investigations, and actions taken will be documented and securely stored.
- Records will be maintained for a specified period in accordance with the college's data retention policy and relevant legal requirements.

4) Periodic Review

- The reporting mechanisms will be reviewed periodically to ensure they remain effective and accessible.
- Feedback from employees, students, and third parties will be sought to identify areas for improvement.

By establishing these robust reporting mechanisms, Al Maarif University College demonstrates its commitment to transparency, accountability, and ethical conduct in all its operations.

7. Monitoring and Review at Al Maarif University College

To ensure the effectiveness and continuous improvement of the Anti-Bribery and Corruption Policy, Al Maarif University College has implemented a structured monitoring and review process. This process aims to assess compliance, identify areas for improvement, and adapt to changes in regulations and best practices.

1) Regular Audits and Assessments

- ❖ **Internal Audits:** The Compliance Officer, in collaboration with the Internal Audit Department, will conduct regular audits of the college's operations and transactions to ensure compliance with the Anti-Bribery and Corruption Policy.
- ❖ **Risk Assessments:** Periodic risk assessments will be conducted to identify and evaluate potential bribery and corruption risks. This includes assessing the effectiveness of existing controls and implementing additional measures if necessary.

2) Performance Metrics and Reporting

- ❖ **Key Performance Indicators (KPIs):** Establish and track KPIs related to bribery and corruption prevention, such as the number of reported incidents, the resolution time for investigations, and the outcomes of audits.



- ❖ **Reporting to Leadership:** Regular reports on the effectiveness of the Anti-Bribery and Corruption Policy, audit findings, and risk assessments will be presented to the college leadership and the Board of Trustees.
- 3) **Review of Policies and Procedures**
- ❖ **Policy Updates:** The Anti-Bribery and Corruption Policy will be reviewed annually, or more frequently if necessary, to ensure it remains relevant and effective. Updates will be made to reflect changes in legislation, industry standards, and organizational needs.
 - ❖ **Procedure Enhancements:** Based on audit findings, risk assessments, and feedback from stakeholders, procedures will be enhanced to address any identified gaps or weaknesses.
- 4) **Training and Awareness Programs**
- ❖ **Ongoing Training:** Regular training sessions will be provided to employees, students, and third parties to reinforce their understanding of the Anti-Bribery and Corruption Policy and any updates.
 - ❖ **Feedback Mechanisms:** Collect feedback from training participants to assess the effectiveness of the training programs and identify areas for improvement.
- 5) **Whistleblower Monitoring**
- ❖ **Whistleblower Protection:** Ensure that the mechanisms for reporting and protecting whistleblowers are effective and that individuals feel safe and supported when raising concerns.
 - ❖ **Review of Reports:** Periodically review whistleblower reports and the outcomes of investigations to identify trends and take corrective actions as necessary.
- 6) **External Reviews and Benchmarks**
- ❖ **External Audits:** Engage external auditors to review the Anti-Bribery and Corruption Policy and its implementation periodically. This provides an independent assessment of the college's compliance and effectiveness.
 - ❖ **Benchmarking:** Compare the college's policies and practices against industry standards and best practices to ensure alignment and identify opportunities for improvement.
- 7) **Continuous Improvement**
- ❖ **Lessons Learned:** Document lessons learned from incidents of bribery and corruption, audits, and risk assessments to prevent future occurrences.
 - ❖ **Adaptation and Innovation:** Stay informed about emerging trends, technologies, and regulatory changes related to anti-bribery and corruption, and adapt policies and practices accordingly.

By implementing a comprehensive monitoring and review process, Al Maarif University College ensures that its Anti-Bribery and Corruption Policy remains effective, relevant, and aligned with the highest standards of ethical conduct..



8. Sanctions at Al Maarif University College

Al Maarif University College is committed to enforcing its Anti-Bribery and Corruption Policy strictly. Violations of this policy will not be tolerated and will result in appropriate disciplinary actions. The following sanctions may be applied depending on the severity and nature of the violation:

1) For Employees and Faculty Members

- ❖ Verbal or Written Warning: For minor or first-time offenses, a formal warning may be issued.
- ❖ Suspension: Temporary removal from duties or suspension without pay may be imposed for more serious violations.
- ❖ Termination of Employment: In cases of severe or repeated violations, the college may terminate the employment of the individual involved.
- ❖ Legal Action: If the violation constitutes a criminal offense, the college may refer the matter to law enforcement authorities for prosecution.

2) For Students

- ❖ Verbal or Written Warning: Minor infractions may result in a warning.
- ❖ Probation: The student may be placed on probation, with specific conditions that must be met to continue their studies.
- ❖ Suspension: The student may be temporarily suspended from the college.
- ❖ Expulsion: In severe cases, the student may be expelled from the college.
- ❖ Legal Action: For criminal offenses, the college may involve law enforcement authorities.

3) For Contractors, Consultants, and Third Parties

- ❖ Termination of Contract: Contracts or agreements may be terminated if the third party is found to have violated the policy.
- ❖ Legal Action: The college may pursue legal action against third parties involved in bribery or corruption.
- ❖ Blacklisting: The third party may be blacklisted and prohibited from future business with the college.

4) For All Parties

- ❖ Restitution: Individuals or entities may be required to compensate the college for any losses or damages resulting from their actions.
- ❖ Reputational Damage: Public disclosure of the violation and the actions taken by the college may be made to maintain transparency and integrity.

5) Enforcement and Consistency

- ❖ Fair Process: All investigations and disciplinary actions will be conducted fairly, impartially, and in accordance with the college's established procedures.



- ❖ Consistency: Sanctions will be applied consistently across all levels of the organization to ensure fairness and maintain the integrity of the policy.

6) Appeals

- ❖ Individuals subject to disciplinary actions have the right to appeal the decision. The appeal process will be outlined in the college's disciplinary procedures.

By implementing these sanctions, Al Maarif University College demonstrates its commitment to maintaining a zero-tolerance approach to bribery and corruption. This reinforces the college's dedication to upholding the highest ethical standards and fostering a culture of integrity.

9. Training and Awareness at Al Maarif University College

To ensure the effective implementation of the Anti-Bribery and Corruption Policy, Al Maarif University College is committed to providing comprehensive training and raising awareness among all employees, students, and associated third parties. The following measures will be implemented:

1) Mandatory Training Programs

- ❖ **For Employees and Faculty Members:** All new employees and faculty members will undergo mandatory training on the Anti-Bribery and Corruption Policy during their onboarding process. Regular refresher courses will be provided to ensure continued awareness and compliance.
- ❖ **For Students:** Educational sessions on ethics, integrity, and the Anti-Bribery and Corruption Policy will be incorporated into the curriculum. Special workshops and seminars will be organized to raise awareness among students.
- ❖ **For Contractors, Consultants, and Third Parties:** Training sessions and informational materials will be provided to all third parties associated with the college to ensure they understand and comply with the policy.

2) Training Content

- ❖ **Overview of the Policy:** Explanation of the Anti-Bribery and Corruption Policy, including its purpose, scope, and key provisions.
- ❖ **Legal Framework:** Information on relevant anti-bribery and corruption laws and regulations that apply to the college and its operations.
- ❖ **Examples of Bribery and Corruption:** Real-life scenarios and case studies to illustrate different forms of bribery and corruption, and how to recognize and avoid them.
- ❖ **Reporting Mechanisms:** Detailed guidance on how to report suspected incidents of bribery and corruption, including the use of confidential reporting channels and whistleblower protection.



- ❖ **Consequences of Violations:** Explanation of the sanctions and disciplinary actions that may be taken against individuals or entities that violate the policy.

3) Awareness Campaigns

- ❖ **Communication Channels:** Utilize various communication channels, including emails, newsletters, posters, and the college's intranet, to regularly remind employees, students, and third parties about the importance of compliance with the Anti-Bribery and Corruption Policy.
- ❖ **Ethics Week:** Organize an annual Ethics Week dedicated to promoting ethical behavior and raising awareness about bribery and corruption. Activities may include guest speakers, panel discussions, and interactive workshops.
- ❖ **Informational Materials:** Develop and distribute brochures, flyers, and FAQs that provide concise and accessible information about the policy and how to adhere to it.

4) Monitoring and Evaluation

- ❖ **Training Attendance:** Keep records of attendance at all training sessions to ensure that all required individuals have received the necessary training.
- ❖ **Feedback Mechanisms:** Collect feedback from participants to assess the effectiveness of the training programs and identify areas for improvement.
- ❖ **Continuous Improvement:** Regularly review and update training materials to reflect changes in laws, regulations, and best practices, ensuring that the training remains relevant and effective.

5) Leadership Commitment

- ❖ **Role of Leadership:** College leadership will actively promote and participate in training and awareness programs, demonstrating their commitment to the Anti-Bribery and Corruption Policy.
- ❖ **Open Dialogue:** Encourage open dialogue between leadership and employees, students, and third parties about ethical behavior and the importance of adhering to the policy.

By implementing these comprehensive training and awareness measures, Al Maarif University College aims to foster a culture of integrity and ethical behavior, ensuring that all members of the college community understand and comply with the Anti-Bribery and Corruption Policy.