

# PARUL UNIVERSITY

Office of the Registrar  
June 22, 2024

R/Notification-ABAC/06/2024-25

## NOTIFICATION

**Sub: Policy for Anti-Bribery and Anti-Corruption**

**Ref: (i) Orders of the President**

### 1. Preamble

Parul University is committed to the highest standards of integrity, transparency, accountability and ethical conduct in all its academic, administrative, financial, research and outreach activities.

The University adopts a zero-tolerance approach to bribery and corruption. No person acting for, on behalf of, or in connection with the University shall offer, promise, give, request, solicit, receive or accept any improper financial or other advantage intended to influence a decision, secure an undue benefit, or compromise integrity in any form.

This Policy is intended to promote ethical conduct, safeguard institutional reputation, support lawful and transparent decision-making, and provide a clear framework for prevention, reporting, review and action in relation to bribery and corruption.

### 2. Purpose

This Policy aims to:

- prevent bribery, corruption and related unethical conduct in University activities;
- set clear expectations for ethical behaviour and responsible decision-making;
- provide a framework for gifts, hospitality, third-party interactions and reporting;
- support a culture of integrity, transparency and accountability; and
- guide implementation, awareness, oversight and periodic review.

### 3. Scope

This Policy applies, as relevant, to:

- members of the Governing Body, management and University authorities;
- faculty, staff, officers and employees;
- students;
- contractual, temporary, outsourced and agency personnel;
- consultants, advisors, service providers, contractors, vendors, agents and intermediaries acting for or on behalf of the University; and
- any person participating in University-related procurement, admissions, examinations, finance, research, approvals, partnerships, placements, community engagement or other institutional processes.

This Policy applies to conduct on campus, off campus, during official travel, in digital or online interactions, and in all activities undertaken in the name of or for the benefit of the University.

### 4. Definitions

**Bribery:** the offering, promising, giving, requesting, soliciting, receiving or accepting of any financial or other advantage with the intention of improperly influencing a decision, action or outcome.

**Corruption:** the abuse of entrusted power, position or authority for private gain, institutional gain obtained improperly, or other undue advantage.

**Improper Advantage:** money, gifts, hospitality, favors, services, employment opportunities, academic benefit, admission-related benefit, procurement preference, confidential information, or any other benefit intended to influence a person improperly.

**Facilitation Payment:** an unofficial payment or benefit made to expedite or secure routine action or preferential treatment. Facilitation payments are prohibited under this Policy.

## **5. Policy Statement**

Parul University prohibits bribery and corruption in any form.

No person covered by this Policy shall:

- offer or give any improper advantage to influence a decision or secure a benefit;
- request or accept any improper advantage in return for performing, delaying or influencing any University-related act;
- misuse position, authority, process or information for personal or improper institutional gain;
- conceal, falsify or misstate records relating to payments, gifts, approvals or transactions; and
- retaliate against a person who raises a concern in good faith under this Policy.

## **6. Gifts, Hospitality and Benefits**

Gifts, hospitality, mementos, honoraria or other courtesies shall not be offered, promised, given, requested or accepted where they:

- are intended, or could reasonably be perceived, to influence a decision;
- create a conflict of interest or obligation;
- are excessive, frequent, non-transparent or inappropriate in the circumstances; or
- relate to admissions, examinations, procurement, approvals, inspections, appointments, evaluation, accreditation, grants or any other sensitive decision-making process.

Modest and bona fide ceremonial or commemorative items may be permitted only where lawful, transparent, infrequent, not decision-linked, and consistent with approved University procedures. Any gift, hospitality or benefit that may give rise to doubt, perceived influence or conflict shall be disclosed promptly through the designated University process. The University may require recording, approval, return, refusal, surrender or other appropriate disposal of such item in accordance with approved procedure.

## **7. Conflict of Interest and Undue Influence**

All persons covered by this Policy shall avoid situations in which personal, financial, family, academic, political, business or other interests improperly influence, or appear to influence, University decisions. Any actual, potential or perceived conflict of interest relevant to a University matter shall be disclosed promptly through the appropriate channel, and the concerned person shall cooperate with any mitigation or recusal process required by the University.

## **8. Third Parties, Vendors and Partners**

The University expects its vendors, contractors, consultants, agents, intermediaries, service providers and other third parties acting on its behalf to comply with this Policy and with applicable law. Appropriate contractual, procedural or due diligence measures may be adopted by the University to communicate compliance expectations, reduce bribery and corruption risks, and support action where misconduct is suspected or identified.

## **9. Books, Records and Transparency**

All financial, procurement, administrative and other institutional records shall be maintained accurately, completely and transparently. No off-the-record transaction, false entry, misleading description, concealed payment or unrecorded benefit shall be permitted in connection with University business.

## **10. Ethics Oversight and Compliance**

**Parul University shall have a designated Ethics and Integrity Compliance Officer / Office to coordinate implementation of this Policy, receive or guide reports, support awareness and facilitate appropriate review and follow-up in accordance with approved University procedures.**

The University may also constitute or notify an appropriate committee, authority or mechanism to support oversight, review, guidance, investigation referral and institutional compliance under this Policy.

## **11. Reporting and Whistleblower Protection**

Any person who knows of, suspects, witnesses or is affected by conduct inconsistent with this Policy is encouraged to report the matter promptly through designated University channels.

The University shall endeavour to:

- provide confidential reporting routes;
- allow reporting to designated authorities through official channels;
- handle concerns in a fair, timely and sensitive manner;
- maintain confidentiality to the extent reasonably possible, subject to legal and procedural requirements; and
- protect persons making good-faith reports from retaliation, victimisation or adverse treatment.

Malicious or knowingly false complaints may be addressed under applicable rules. However, a complaint made in good faith shall not attract adverse action merely because it is not substantiated.

## **12. Investigation, Action and Consequences**

Suspected violations of this Policy may be reviewed or investigated through appropriate University mechanisms and, where required, referred to competent authorities. Where a violation is established, the University may take appropriate corrective, preventive, disciplinary, contractual, academic, administrative or legal action in accordance with applicable rules, procedures and law.

## **13. Training and Awareness**

The University shall promote awareness and understanding of this Policy among relevant stakeholders. Such measures may include:

- induction and orientation;
- periodic training for faculty, staff and relevant officials;
- targeted guidance for high-risk functions such as procurement, admissions, examinations, finance, research and external engagement; and
- communication of policy expectations to vendors, contractors and business partners.

## **14. Responsibilities**

**University Administration:** shall support implementation, communication, oversight and review of this Policy.

**Heads of Departments / Units / Offices:** shall promote compliance within their areas and respond appropriately to concerns brought to their notice.

**Faculty, staff, students and third parties:** shall comply with this Policy, avoid prohibited conduct, disclose concerns responsibly, and cooperate with review or investigation processes.

### **15. Related Policies and Interpretation**

This Policy shall be read together with related University rules and policies, including those relating to ethics, conduct, procurement, finance, conflict of interest, whistleblowing, grievance redressal, staff discipline, student discipline and applicable statutory requirements. In case of inconsistency, applicable law and formally approved University rules or procedures shall prevail.

### **16. Publication**

The University may publish this Policy, together with such related procedures, reporting channels or guidance as it considers appropriate, on its official website or through other official means.

By Order

  
Registrar

**To,**

- 1) Dean, Doctoral Studies and Research
- 2) Deans of Faculties
- 3) Principals/Directors of Colleges/ Institutes
- 4) Director (IQAC)
- 5) Managing Director (Global), Industrial Collaborations; Academic Strategies
- 6) Academic Directors
- 7) Dean, Students' Welfare
- 8) Controller of Examinations
- 9) Chief Librarian
- 10) Director, CDC / PIERC / CIRR / OIA/ AFMC / RDC/ Marketing / CDOE/ EDP / CEC / Alumni Association / Events Cell / Centre for Human Resources Development/ Security/ Physical Education and Sports/ Internship Cell/ Staff and Students Welfare Cell/ ICT Cell/ Learning and Academic Enrichment/ Faculty Updation (CSE/IT/CA)/ CMIE/ Partnerships (Institutes of National Importance)/ SCOPE
- 11) Chief Finance and Accounts Officer
- 12) Central Administration
- 13) Accounts Section
- 14) Students' Section
- 15) Head, Central Administration / Accounts / Purchase/ Transport/ MIS / Students' Section

**Submitted to,**

1. The President
2. Dr.Parul Patel, Vice President (Student Affairs and General Administration) and Chairperson, Admissions Committee, Parul University
3. Dr. Geetika Madan Patel, Vice President (Quality, Research and Health Sciences), Parul University
4. Dr. Komal Patel, Vice President (Medical and Paramedical Sciences), Parul University
5. The Provost