

Anti Bribery Policy

INTRODUCTION

Bribery is, in the conduct of the College's business, the offering or accepting of any gift, loan, payment, reward or advantage for personal gain as an encouragement to do something which is dishonest, illegal or a breach of trust.

Bribery is a criminal offence. The College prohibits any form of bribery. We require compliance, from everyone connected with our institution, with the highest ethical standards and anti-bribery laws applicable. Integrity and transparency are of utmost importance to us and we have a zero tolerance attitude towards corrupt activities of any kind, whether committed by Corpus Christi College's employees or by third parties acting for or on behalf of the College.

PURPOSE

The purpose of this policy is to convey to all employees and interested parties of Corpus Christi College the rules of the College in relation to our unequivocal stance towards the prevention of bribery and our commitment to ensuring that the College conducts its business in a fair, professional and legal manner.

SCOPE

This policy applies to all employees of Corpus Christi College, regardless of seniority or site. It also extends to anyone working for or on our behalf e.g. those engaged by us on a self-employed basis or an agency arrangement.

POLICY

It is prohibited, directly or indirectly, for any employee or person working on our behalf to offer, give, request or accept any bribe i.e. gift, loan, payment, reward or advantage, either in cash or any other form of inducement, to or from any person or company in order to gain commercial, contractual or regulatory advantage for Corpus Christi College, or in order to gain any personal advantage for an individual or anyone connected with the individual in a way that is unethical.

If we suspect that a member of staff has committed an act of bribery or attempted bribery, an investigation will be carried out and, in line with our disciplinary procedure where appropriate, action may be taken against the member of staff which may result in their dismissal, or the cessation of our business arrangement with a company.

If as an employee or person working on our behalf, a member of staff suspects that an act of bribery or attempted bribery has taken place, even if the member of staff is not personally involved, s/he is expected to report this to the Bursar. They may be asked to give a written account of events.

Members of staff are reminded of Corpus Christi College's policy on making a protected disclosure which is available in the Staff Handbook, or upon request.

GIFTS AND HOSPITALITY

Corpus Christi College realises that the giving and receiving of gifts and hospitality as a reflection of *friendship or appreciation* where nothing is expected in return may occur, or even be commonplace. This does **not** constitute bribery where it is proportionate and recorded properly. However, all gifts with a value in excess of £50 must be reported to the Bursar and recorded. In the case of a Fellow receiving such a gift it should be reported to the President.

If a member of staff or anyone working on our behalf in connection with our business is in any doubt as to whether offering or receiving a gift or hospitality is a reflection of friendship or appreciation or, could be construed as a bribe, then they should seek prior written approval from the Bursar, or in the case of a Fellow, from the President.

This policy is subject to regular review and Corpus Christi College reserves the right to amend this policy without prior notice.