

## ALL SOULS COLLEGE

### ANTI-BRIBERY POLICY

#### 1. All Souls College does not tolerate bribery.

Bribery is a criminal offence in the United Kingdom and the College expects all members of the College and third parties who have dealings with it to comply with the law and observe the highest ethical standards in their conduct of business with or on behalf of the College. All Souls may take disciplinary action – which may include dismissal – against the Warden, any Fellow, or any member of staff who commits or attempts bribery in connection with his or her employment by the College. All Souls may terminate any business arrangements with any third party if that third party commits or attempts bribery.

#### 2. Definition of 'bribery'.

Bribery as defined in the Bribery Act 2010 includes the offering, promising, giving, requesting, or acceptance of a financial or other advantage in circumstances which are intended to induce or reward improper performance of a function or activity that is of a public nature performed in the course of a person's employment, connected with a business or trade, or performed on behalf of a body of people, and a reasonable person in the UK would expect to be performed in good faith, impartially, or in accordance with a position of trust.

In the context of All Souls College, bribery might, for example, include:

- the offer or receipt of goods or services for private use at favourable prices or at no charge in order to secure or retain College business;
- payment from an external contractor to the Warden, a Fellow, a member of staff, or other College adviser, in return for receiving a contract from the College; or

- payment to the Warden, Fellow, or a member of staff in return for that person improperly performing their duties.

### **3. Whistle-blowing is encouraged and protected.**

If the Warden, any Fellow, or any member of staff suspects that bribery has occurred in connection with the College, he or she should report the matter immediately to the Warden or to the Estates or Domestic Bursar as appropriate.

Fellows and staff are reminded of the College Whistle-blowing Policy setting out the College procedures for making a protected disclosure. It is available in the Staff Handbook, on the intranet, or upon request from the Bursary.

### **4. Registers of gifts, hospitality, and interests.**

The giving and receiving of gifts and hospitality from suppliers is not expected or encouraged. However, it is recognised that on occasion a third party may offer minor hospitality or gifts to a member of the College as mark of appreciation or in connection with College purposes. Where it is clear that this is reasonable, appropriate, and could not be regarded as bribery, it is permissible for minor hospitality or gifts to be accepted. However, in case of doubt, the Warden or the Estates or Domestic Bursar should be consulted first and their written advice obtained. In order to ensure transparency, all acceptances of gifts and hospitality from College suppliers or potential suppliers with a value in excess of £50 must also be recorded in the Gifts and Hospitality Register (which is maintained by the Bursars' Secretary). Staff and Fellows may exercise their discretion as to whether they also record such offers that are declined. The register will be subject to regular inspection by the Audit Committee which may also review any relevant correspondence on the acceptance of gifts or hospitality.

The College also maintains a Register of External Interests in which all Fellows and senior members of staff are required to record their external interests. Where there is a potential conflict of interest, they should not be involved in decision-making.