

## **Appendix 10: Anti-Bribery Policy**

### **INTRODUCTION**

Bribery is, in the conduct of the College's activities, 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 activities, 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, and in any context whatsoever, whether committed by a member of Lady Margaret Hall's academic or support staff or by third parties acting for or on behalf of the College.

### **OFFENCES**

It is a criminal offence to:

- offer a bribe;
- accept a bribe;
- bribe a foreign official;
- as an academic institution, to fail to prevent a bribe.

You should be aware that if you are found guilty by a court of committing bribery, you could face up to 10 years in prison and/or an unlimited fine. The College could also face prosecution and be liable to pay a fine.

### **PURPOSE**

The purpose of this policy is to convey to all staff and interested parties of Lady Margaret Hall the rules of the College in relation to our unequivocal stance towards the avoidance 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 academic and support staff of Lady Margaret Hall regardless of seniority. It also extends to anyone working for or on our behalf e.g. those engaged by us as volunteers, on a self-employed basis, or an agency arrangement.

We will encourage the application of this policy where our business involves the use of third parties e.g. suppliers; contractors.

### **POLICY**

It is prohibited, directly or indirectly, 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 the Company, or in order to gain any personal advantage for an individual or anyone connected with the individual in a way that is unethical.

If you are offered a bribe, or a bribe is solicited from you, you should not agree to it unless your immediate safety is in jeopardy. You should immediately contact the Treasurer so that action can be taken if considered necessary. You may be asked to give a written account of events.

If you, as staff member or person working on our behalf, suspect that an act of bribery, or attempted bribery, has taken place, even if you are not personally involved, you are expected to report this to the Treasurer. You may be asked to give a written account of events.

Appropriate checks will be made before engaging with suppliers or other third parties of any kind to reduce the risk of our business partners breaching our anti-bribery rules.

The College will ensure that all of its transactions, including any sponsorship or donations given to charity, are made transparently and legitimately.

Lady Margaret Hall takes any actual or suspected breach of this policy extremely seriously and will carry out a thorough investigation should any instances arise.

We will uphold laws relating to bribery and will take disciplinary action against any staff member, or other relevant action against persons working on our behalf or in connection with us, should we find that an act of bribery, or attempted bribery, has taken place. This action may result in your dismissal if you are a staff member, or the cessation of our arrangement with you if you are a volunteer, self-employed, an agency worker, contractor etc.

Staff are reminded of the College's Whistleblowing policy set out in the revised Employee Handbook, which will be available from December 2011, or upon request.

## **GIFTS AND HOSPITALITY**

This Policy should be read in conjunction with the College's:

- Conflict of Interest Policy (members of Governing Body, its Committees and senior members of staff); and
- Policies on the Acceptance of Gifts, Hospitality and Benefits by Members of the Support Staff and on Lost, Left or Abandoned Property.

---

As the law is constantly changing, this Policy is subject to review and the College reserves the right to amend this Policy without prior notice.

**Approved by Governing Body 30 November 2011**