



exeter college

Anti-Bribery Policy

Written by: Kate Barczok (College Accountant)
CLT Sponsor: Richard Church (Chief Financial Officer)
Consulted with: Clerk to Corporation / Senior Leadership Team
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1 Purpose

The College has a zero-tolerance for bribery and corruption. The College's reputation with the community it serves, and other stakeholders is underpinned by ethical behaviour, financial probity and honesty. The College aims to limit its exposure to bribery by:

- 1.1 Setting out a clear anti-bribery policy, which is proportionate to the risks that the College is exposed to;
- 1.2 Embedding awareness and understanding of the College's anti-bribery policy amongst all staff, "associated persons" (any person performing services for or on behalf of the College), and external persons/organisations with whom the College has commercial relations;
- 1.3 Training staff as appropriate so that they can recognise and avoid the use of bribery by themselves and others;
- 1.4 Encouraging staff to be vigilant and to report any suspicion of bribery, providing them with suitable channels of communication (Whistle Blowing Policy) and ensuring sensitive information is treated appropriately;
- 1.5 Rigorously investigating instances of alleged bribery in accordance with the College disciplinary procedure; and assisting the Police and other appropriate authorities in any resultant prosecution;
- 1.6 Taking firm and vigorous action against any individual(s) involved in bribery.

2 Definitions

The term College covers the College and its subsidiaries.

3 Policy

This policy applies to all employees and anyone acting for, or on behalf of, the College ("associated persons"), including governors, other volunteers, temporary workers, consultants and contractors.

All employees and associated persons are responsible for maintaining the highest standards of business conduct and are expected to behave honestly and with integrity. Any breach of this policy will constitute a serious disciplinary offence, which may lead to dismissal and may become a criminal matter for the individual.

The College prohibits employees and associated persons from offering, giving, soliciting or accepting any bribe. The bribe might include cash, a gift or other inducement, to or from any person or organisation, wherever they are situated, and irrespective of whether or not they are a public official/body or private person or company, by any individual governor, employee, agent or other person or body acting on the College's behalf. The bribe might be made in order to:

- Gain any commercial, contractual or regulatory advantage for the College in a way which is unethical;
- Gain any personal advantage, pecuniary, or otherwise, for the individual or anyone connected with the individual.

This policy is not intended to prohibit appropriate corporate entertainment and/or hospitality undertaken in connection with the College's business activities, provided the activity is customary under the circumstances, is proportionate, and is properly recorded/disclosed to the College in accordance with its procedures (Financial Regulations, College Code of Conduct, Conflict of Interests and Register of Interests).

Employees and associated persons are requested to remain vigilant in preventing, detecting and reporting bribery. Employees and associated persons are expected to report any concerns regarding any suspected bribery in accordance with the College's procedures (Financial Regulations, Whistle Blowing Policy).

Receiving Gifts or Hospitality

It is an offence under the Bribery Act 2010 for employees and associated persons to accept corruptly any gift or consideration as an inducement or reward for doing, or refraining from doing, anything in an official capacity or showing favour or disfavour to any person in an official capacity. The guiding principles to be followed by all employees and associated persons must be:

- The conduct of individuals should not create suspicion of any conflict between their official duty and their private interest
- The action of individuals acting in an official capacity should not give the impression that they have been influenced by a benefit to show favour or disfavour to any person or organisation.

Thus, employees and associated persons should not accept any gifts, rewards or hospitality (or have them given to members of their families) from any organisation or individual with whom they have contact in the course of their work that would cause them to reach a position whereby they might be, or might be deemed by other to have been, influenced in making a business decision as a consequence of accepting such hospitality. The frequency and scale of hospitality accepted should not be significantly greater than the College would be likely to provide in return.

For the protection of those involved, the Clerk to the Corporation will maintain a register of gifts and hospitality received where the value is in excess of £100. Employees and associated persons in receipt of such gifts or hospitality are obliged to notify the Clerk promptly. This register is reviewed with in the Internal Audit process for the college.

4 Associated Documentation

- 4.1 Financial Regulations
- 4.2 Whistle Blowing Policy
- 4.3 The Bribery Act 2012

5 Monitoring, Reviews and Evaluation

- 5.1 The Senior Leadership team is responsible for the approving of the Anti-Bribery Policy.
- 5.2 The Board (Audit and Risk Assurance Committee) is responsible for adopting the Anti-Bribery Policy.
- 5.3 The Chief Financial Officer is responsible for the maintenance, review and monitoring of the Anti-Bribery Policy and will ensure a bi-annual review.
- 5.4 The definitive version of the policy is stored in the College Leadership SharePoint Site.