



# Jesus College OXFORD

## Bribery Policy

### 1. Introduction

- 1.1 Bribery is a criminal offence. Jesus College prohibits any form of bribery. We require compliance, from everyone connected with our business, 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 Jesus College employees or by third parties acting for or on behalf of Jesus College.

### 2. Scope

This policy applies to all fellows and employees of Jesus College, regardless of seniority or location. It also extends to anyone working for, or on our behalf, eg those engaged by us 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 eg. suppliers; contractors.

### 3. Policy

- 3.1 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 Jesus College, or in order to gain any personal advantage for an individual or anyone connected with the individual in a way that is unethical.
- 3.2 If an employee, worker or Fellow of the College suspects that a member has staff have committed an act of bribery or attempted bribery, an investigation will be carried out and, in line with our disciplinary procedure, where appropriate, action will be taken. Such action may result in a disciplinary warning, dismissal, or the cessation of our business arrangement with a company.
- 2.3 If a person suspects that an act of bribery or attempted bribery has taken place, the employee or worker is expected to report this to a College Officer. They may be asked to give a written account of events.
- 2.4 The College will issue guidance to assist employees with the compliance of this policy, and will ensure that third parties working on behalf of the College are aware of the College's policy.
- 2.5 Fellows and employees are reminded of the College's Whistleblowing policy which is detailed on the College's website.
- 2.6 The Risk and Audit Committee will carry out periodic risk assessments related to bribery and fraud.



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### 4. Gifts and hospitality

- 4.1 Jesus 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. This does **not** constitute bribery where it is proportionate and recorded properly. However, all gifts with a value in excess of £30 must be recorded in the Register of Interests and reported to the relevant College Officer.
- 4.2 Gifts may include: money; goods (flowers, vouchers, food, drink, event tickets (when not part of a hosted business context) services or loans.
- 4.3 Hospitality may include: entertaining, meals or event tickets (when used in a hosted business context) given or received to develop relations. Hospitality will become a gift if the host is not present.
- 4.4 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 relevant College Officer.

### 5. Register of Interests

The College will maintain a Register of Interests that will be updated annually.

### 6. Review

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