



1. INTRODUCTION

Bribery is unethical conduct and a criminal offence under UK legislation. St Catherine's College prohibits any form of bribery consistent with its "zero tolerance" attitude towards corrupt activities of any kind, whether committed by its employees or other associated persons.

2. POLICY

It is prohibited for any employee or other person performing services for or on behalf of the College to offer, promise or give any financial or other advantage to another person: (a) as an inducement or reward for the improper performance of a relevant function or activity by any person; or (b) in the knowledge or belief that acceptance of the advantage would itself constitute the improper performance of a relevant function or activity.

It is also prohibited for any employee or other person performing services for or on behalf of the College to request, agree to receive or accept a financial or other advantage: (a) as an inducement or reward for the improper performance of a relevant function or activity; (b) where such request, agreement or acceptance itself constitutes the improper performance of a relevant function or activity; or (c) in anticipation or consequence of which a relevant function or activity is performed improperly.

For the purpose of this policy, a "relevant function or activity" is: (a) any function which is of a public nature, or any activity which is connected with St Catherine's College, performed in the course of a person's employment by St Catherine's College, or performed by or on behalf of St Catherine's College; and (b) which a person is expected to perform in good faith, impartially, or is in a position of trust by virtue of performing it.

If the College suspects a person to have committed or attempted to commit an act of bribery, an investigation will be carried out and, where appropriate in line with our disciplinary procedures, action taken which may include dismissal of any implicated employee and/or dissociation with any implicated person or organisation.

Any employee or other associate of the College who suspects that an act of bribery or attempted bribery has taken place is required to report his or her suspicions to the Home Bursar immediately.

St Catherine's College's has a whistle-blowing policy which is available in the Staff Handbook or upon request from the Personnel Advisor.

3. GIFTS AND HOSPITALITY

The acceptance of gifts and hospitality from current or prospective students and people associated with them raises particular risks of bribery for College employees. In reflection of this, and to ensure that the College meets its own obligations with respect to bribery, all gifts with a value in excess of £15 must be recorded within one week of receipt with the Home Bursar.

Any employee or associate of the College who is in any doubt as to the appropriateness of offering or accepting a gift or hospitality is required to seek prior written approval for the offer or acceptance from the Home Bursar.

This policy shall be subject to review and amendment without prior notice.