



Anti-Bribery Policy

January 2024



INTRODUCTION

Bribery is a criminal offence. Linacre College prohibits any form of bribery. We require compliance with the highest ethical standards and anti-bribery laws applicable, from everyone connected with our business. Integrity and transparency are of utmost importance to us and we will not tolerate corruption of any kind, whether committed by Linacre College employees or by third parties acting for or on behalf of Linacre College.

POLICY

It is prohibited for any employee or person working on our behalf to offer, give, request or accept a bribe, directly or indirectly. A bribe is a gift, loan, payment, reward or advantage given to corrupt a person and induce him/her to act unethically in the interest of the College or the giver.

If we suspect that a member of staff has committed an act of bribery or attempted bribery, an investigation will be carried out and, where appropriate, action may be taken against the member of staff, in line with our disciplinary procedure, which may result in their dismissal, or the cessation of our business arrangement with a company.

If a member of staff or person working on our behalf, suspects that an act of bribery or attempted bribery has taken place, even if the member of staff is not personally involved, s/he is expected to report this to the relevant College Officer. S/he may be asked to give a written account of events.

Members of staff are reminded of the College whistle-blowing policy which is stated on page 16 of the College Employee Handbook.

GIFTS AND HOSPITALITY

Linacre 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, or even be commonplace. This does **not** constitute bribery where it is proportionate and recorded properly. However, all gifts with a value in excess of £25 must be recorded with the Bursar or the Principal.

If you are 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 you should seek prior written approval from the Bursar or Principal.

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

