

Anti-Bribery Policy

Adopted by Council: June 2016

Review Date: 2019

Committee Ownership: Finance

INTRODUCTION

Bribery is a criminal offence. Murray Edwards College prohibits any form of bribery. We require compliance, from everyone connected with our institutional 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 whether committed by Murray Edwards College employees, office holders or third parties acting for or on behalf of the College.

POLICY

It is prohibited, directly or indirectly, for any employees, office holders 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 Murray Edwards College, or in order to gain any personal advantage for an individual or anyone connected with the individual in a way that is unethical. It is similarly prohibited for any employees, office holders or persons working on behalf of the College, to request or accept any form of inducement to depart from normal College operating procedures and policies, including those relating to the admission of students.

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

If as an employee, office holder or person working on behalf of the College, a member of staff 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 Bursar (or the President). They may be asked to give a written account of events.

Staff are reminded of the College's whistle-blowing policy, which is available in the Staff Handbook, or upon request.

GIFTS AND HOSPITALITY

Murray Edwards College realizes that the giving and receiving of small gifts and occasional hospitality as a reflection of appreciation, affiliation or institutional friendship, where nothing is expected in return, may occur. This does not constitute bribery where it is proportionate.

Gifts with a value estimated to be in excess of £50 must be reported to the Bursar and recorded in the Register of Hospitality and Gifts, which is held by the Bursar's Assistant in the Bursary.

Hospitality of significant value, that is likely to have a cost to the provider of more than £50, should be similarly recorded. Exceptions to this rule would be hospitality received from the University and other Colleges in Cambridge which follow the normal pattern of invitations within the collegiate University, arising from academic or other working relationships.

If a member of staff, office holder or anyone working on the College's behalf in connection with institutional activities is in any doubt as to whether offering or receiving a gift or hospitality is a reflection of appreciation, affiliation or institutional friendship or could be construed as a bribe, then they should seek prior written approval from the Bursar (or the President).

This policy is subject to review by the Audit Committee triennially but the College reserves the right to amend this policy without prior notice.

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