

## Somerville College

### Bribery and fraud policy

#### **Introduction**

Somerville College is committed to conducting its business fairly, honestly and openly; to the highest standards of integrity; and in accordance with relevant legislation. The College has no tolerance of **bribery** and **fraud**, and believes that action against bribery and fraud is in the broader interests of society. As a charity deriving a significant proportion of its income from public funds, benefactions and charitable organisations, the College is concerned to protect its operations and reputation and its funders, donors, staff and students from the detriment associated with bribery and other corrupt activity. It is therefore committed to preventing bribery and fraud by its staff and any third party acting for or on behalf of the College.

Implementation of this policy lies with the Treasurer.

The College's full *Bribery and Fraud Policy* is published on its website under *Freedom of Information*.

#### **The College's approach to bribery and fraud**

The College will take appropriate action to prevent bribery and all forms of fraud in the College

No College employee or associated person shall seek a financial or other advantage for the College through bribery. No College employee or associated person shall offer, promise, give, request, agree to receive or accept a bribe for any purpose.

The scope of this policy applies to all members of Somerville College, including the academic community, support staff, and students, regardless of seniority. It also extends to anyone working for or on the College's behalf such as those engaged by the College on a self-employed basis or an agency arrangement. The application of this policy is encouraged where our business involves the use of third parties e.g. suppliers; contractors.

The payment or acceptance of facilitation payments or any other "kickback" by College employees and associated persons is unacceptable.

The College has no tolerance of fraud within its operations and College employees and associated persons must not engage in any form of fraud with regard to activity carried out on behalf of the University.

Bribery by College members will be treated as a serious disciplinary offence resulting, potentially, in dismissal and legal action.

## Procedure to report and investigate bribery and fraud

College members, including students or other individuals who reasonably suspect bribery or fraud in the College, should report their concerns as soon as possible to the Treasurer or Principal, providing a brief description of the alleged irregularity, the loss or potential loss involved, and any evidence supporting the allegations or irregularity or identifying the individual or individuals responsible.

Any report of bribery or fraud will be treated as a disclosure under the College's 'Public Interest Disclosure (whistleblowing) policy.

Where concerns about a member of support staff are to be taken forward under this policy, they will be considered by a Bribery Review Group comprising the Treasurer, Vice Principal, College Accountant, and one member of Standing Committee.

The Bribery Review Group will decide on such further steps as are necessary including investigating the concerns, establishing and securing evidence as necessary for criminal and disciplinary action, and ensuring that appropriate action is taken against those responsible as soon as is reasonably practicable.

Any individual who is suspected of bribery may be suspended immediately (without deduction of pay) pending a full investigation. In some cases it may also be necessary to suspend other College members in order to conduct a proper investigation. The suspension of a member of College does not constitute a finding of misconduct against him or her. Any College member suspended as a result of suspected bribery will be informed of the reason for the suspension.

Individuals suspended for suspected bribery, and individuals suspended to enable a proper investigation to be carried out, will normally be required to leave College premises immediately and/or will be denied access to the College's IT facilities. During the period of any suspension they will not be permitted to return to the premises, to make contact with other College members or witnesses, or to act on behalf of the College, unless given express permission to do so by the relevant College officers. Any infringement of this requirement may be treated as a disciplinary offence.

All persons concerned with the investigation must treat the information in strict confidence. Where necessary, information will be transmitted in confidence to relevant regulatory bodies.

An unwarranted breach of confidence may be the subject of disciplinary action.

In all cases where the police are involved, the College reserves the right, where it is reasonable to do so, to proceed with its own disciplinary procedures or with civil proceedings.

## Code of Conduct

It is common practice for suppliers and clients to offer gifts to staff, particularly at Christmas or after an event in College. Such gifts may include chocolates, flowers, a bottle

of wine or spirits. Such gifts may consistently be given to the manager of a department or function. It would not be appropriate for the manager always to accept the gifts personally and where possible these gifts should be shared between the members of the team.

Where gifts are offered that are of a higher monetary value, such as case of wine or spirits, an invitation to a sporting or cultural event, or vouchers with a monetary value, staff should take advice from their manager or the Treasurer about whether or not the gift is considered reasonable and proportionate and therefore may be accepted.

Those members of staff with purchasing authority should be especially mindful of what it would be considered reasonable and proportionate to accept from suppliers and clients by a third party.

On no occasion may any member of staff accept gifts in the form of money. If money is offered or given, it should be returned with a request that the gift is instead given to the College by way of a charitable donation. In order to protect themselves against any potentially unfair allegations, staff should advise their manager without delay if a gift of money has been received and of the action taken.

An offer of a weekend away or a holiday is likely never to be considered an appropriate or reasonable gift to a member of College staff.

The context of *when* a gift is offered is also important. It is unwise to accept any gift from suppliers that coincide with the renewal of annual maintenance or service contracts for example.

In all cases staff should seek advice from their senior manager or the Treasurer if they are in any doubt at all whether or not it would be acceptable to receive a gift.

Those members of staff involved with Development activities on behalf of the College should be mindful that hospitality that is extended by them to potential donors is reasonable and proportionate for proper charitable fundraising purposes.

It is possible that members of staff may ask contractors working on the College site to carry out work at their home. Under no circumstances should any member of staff agree to any work being carried out by such a contractor on a free of charge or goodwill basis.