



Somerville College

Bribery Act 2010: anti-bribery policy

The Bribery Act 2010 contains two general offences covering **the offering, promising or giving of a bribe** (active bribery) and **the requesting, agreeing to receive or accepting of a bribe** (passive bribery). It also sets out two further offences which specifically address commercial bribery: the offence relating to bribery of a foreign public official in order to obtain or retain business or an advantage in the conduct of business, and a new form of corporate liability for failing to prevent bribery on behalf of a commercial organisation. Somerville College takes proportionate action to reduce the risk of bribery relative to the size and nature of the College as an academic institution.

1. Top Level Commitment

The Principal and members of Governing Body are committed to ensuring that the business of the College is conducted without bribery and will not tolerate active, passive, or any other form of bribery by any College member in carrying out activities on behalf of the College. The College has appointed the Treasurer to be responsible for overseeing the anti-bribery policy and actions.

2. Risk Assessment

The College has proportionate procedures in place to reduce the risk of bribery through existing controls over company expenditure, accounting and commercial or agent contracts. A system of authorised signatories and expenditure limits is in place and multiple authorisations are required for significant transactions.

3. Due Diligence

Due diligence will be undertaken on persons who will perform services for the College or on its behalf, for example an agent. It is considered the risk of bribery being committed by such person is low and that such persons are likely to be genuine and can be trusted to do the College's business without bribing. Where appropriate, enquiries with business contacts will be made by the College before others are engaged to represent the College in business dealings.

4. Communication

The College's Anti-Bribery Policy will be communicated to all employees and to those who perform services for the College. Members of staff with purchasing authority will be given additional information regarding anti-bribery measures that are proportionate to their seniority, level of purchasing authority, and role within the organisation.

5. Hospitality

Genuine hospitality or similar business expenditure that is reasonable and proportionate is acceptable. Invitations and/or acceptances to attend sporting events or other hospitality, may be extended or accepted as a reflection of good relations, provided such activity is demonstrably reasonable and proportionate to support the activities of the College.

6. Monitoring and Review

The anti-bribery policy will be reviewed by Governing Body at regular intervals to ensure the risks faced and the effectiveness of the anti-bribery policy and procedures keep pace with any changes in the bribery risks faced by the organisation.

April 2011