

**Bribery, and Personal Gifts Policy**

1. **Introduction**

1.1 The College’s staff and representatives must act, and be seen to act, at all times in a manner that is fair, impartial and without favouritism or bias.

1.2 Bribery is a criminal offence. Jesus College prohibits any form of bribery. We require compliance, from everyone connected with our business, 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 Jesus College employees or by third parties acting for or on behalf of Jesus College.

1. **Scope**

2.1 This policy applies to all fellows and employees of Jesus College, regardless of seniority or location. It also extends to anyone working for, or on our behalf, e.g. those engaged by us on a self-employed basis or an agency arrangement. We will encourage the application of this policy where our business involves the use of third parties e.g. suppliers; contractors.

1. **Policy**

3.1 It is prohibited, directly or indirectly, for any employee 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 Jesus College, or in order to gain any personal advantage for an individual or anyone connected with the individual in a way that is unethical.

3.2 If an employee, worker or Fellow of the College suspects that a member has staff have committed an act of bribery or attempted bribery, an investigation will be carried out and, in line with our disciplinary procedure, where appropriate, action will be taken. Such action may result in a disciplinary warning, dismissal, or the cessation of our business arrangement with a company.

3.3 If a person suspects that an act of bribery or attempted bribery has taken place, the employee or worker is expected to report this to a College Officer. They may be asked to give a written account of events.

3.4 The College will issue guidance to assist employees with the compliance of this policy, and will ensure that third parties working on behalf of the College are aware of the College’s policy.

3.5 Fellows and employees are reminded of the College’s Whistleblowing policy which is detailed on the College’s website.

3.6 The Risk and Audit Committee will carry out periodic risk assessments related to bribery and fraud.

1. **Gifts and hospitality**

4.1 Jesus College recognises that the giving and receiving of gifts and hospitality as a reflection of friendship or appreciation, where nothing is expected in return, may occur. This does not constitute bribery where it is proportionate and recorded properly.

4.2 Gifts may include: money; goods (flowers, vouchers, food, drink, event tickets (when not part of a hosted business context) services or loans. Hospitality may include: entertaining, meals or event tickets (when used in a hosted business context) given or received to develop relations. Hospitality will become a gift if the host is not present. This definition does not include prizes won in open competition or teaching and research prizes or awards. Expenses claimed for work purposes, including travel to academic conferences for the purpose of participation, would not usually be considered a gift.

4.4 If a member of staff or anyone working on our behalf in connection with our business is 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 they should seek prior written approval from the relevant College Officer.

4.5 Gifts and hospitality may only be accepted by Governing Body members, College staff or representatives when:

* the offer has been made for a proper purpose;
* acceptance is consistent with the purposes of the University;
* it is appropriate and its value reasonable and proportionate to the circumstances;
* acceptance accords with all applicable University policies and governmental legislation.

4.6 Acceptance of gifts or hospitality up to a value of **£100** from a single source (individual or cumulative) may be self-certified as long as they conform with policy principles. Perception is important so if you are in any doubt, then it is best to report and record the gift.

4.7 In addition, any gift or act of hospitality up to an actual or estimated value of **£250** **that is directly connected with teaching or research** can also be self-certified as long as these meet the following criteria:

1. what is offered is reasonable and proportionate to the circumstances; and
2. there is clearly no intention, or appearance, of undue influence being exerted upon the recipient(s); and
3. the offer is not, or cannot be construed as, anti-competitive; and
4. the offer does not create any conflict of interest;

4.8 Charitable donations are dealt with under a separate policy. These should all be reported through the Development Office.

4.9 Gifts or hospitality exceeding these self-certification thresholds (single items and series of items) can be declared at any time to the Estates Bursar. The Estates Bursar will declare any qualifying gifts or hospitality they receive to the Principal. The following details should be provided.

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| --- | --- | --- | --- | --- | --- |
| Brief description of the item | Source  | Reason for the gift or hospitality | Dates | Value | Other comments/actions |
| *FA cup final tickets* | *Jim Smith, ABC Ltd* | *Corporate hospitality* | *17 May 2025* | *£200* | *Offered to all staff* |
|  |  |  |  |  |  |

4.10 All Governing Body members will be required to provide an annual return. These will be added to the College Gifts & Hospitality Register. All items reported at a value above £500 will be reviewed by the Risk & Audit Committee.

1. **Register of Interests**

5.1 The College will maintain a Register of Interests that will be updated annually.

1. **Review**

6.1 College reserves the right to regularly update this policy to remain current and in accordance with the law