



ST. JOSEPH'S COLLEGE  
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# Anti-Corruption and Bribery Policy

<b>Policy Owner</b>  Bursar	<b>Associated documents</b>	<b>Legal Framework</b>
<b>Review by</b>  F&GP	<b>Review frequency</b>  Annual	<b>Next Reviewed date</b>  October 2026



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## ST JOSEPH'S COLLEGE ANTI-CORRUPTION AND BRIBERY POLICY

### INTRODUCTION

It is St Joseph's College's policy to conduct all of its business in an honest and ethical manner. We take a zero-tolerance approach to bribery and corruption and are committed to acting professionally, fairly and with integrity in all our business dealings and relationships wherever we operate and implementing and enforcing effective systems to counter bribery. St Joseph's College will comply with the Bribery Act 2010 in respect of its conduct both at home and abroad and the Economic Crime and Corporate Transparency Act (ECCT) 2023, a new corporate criminal offence of 'failure to prevent fraud', designed to drive an anti-fraud culture and improve business confidence.

The purpose of this policy is to:

- a) set out the responsibilities of St Joseph's College, and of those working for us, in observing and upholding our position on bribery and corruption; and
- b) provide information and guidance to those working for us on how to recognise and deal with bribery and corruption issues.

Bribery and corruption are punishable for individuals by up to ten years' imprisonment and if we are found to have taken part in corruption, St Joseph's College could face an unlimited fine and damage to its reputation. We therefore take our legal responsibilities very seriously.

In this policy, 'third party' means any individual or organisation that workers come into contact with during the course of their work for St Joseph's College, and includes actual and prospective pupils and parents, suppliers, business contacts, agents, advisers, and government and public bodies.

### **Who is covered by the Policy?**

This policy applies to all individuals working for St Joseph's College at all levels (whether permanent, fixed-term or temporary), and includes governors, volunteers, agents or any other person associated with St Joseph's College (collectively referred to as 'workers' in this policy).

### **What is Bribery?**

A bribe is an inducement or reward offered, promised or provided in order to gain any business or personal advantage.

### **Gifts and Hospitality**

This policy does not prohibit normal and appropriate hospitality (given and received) to or from third parties.



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The giving or receipt of gifts or hospitality is not prohibited, if the following requirements are met:

- it is not made with the intention of influencing a third party to obtain or retain business or a business advantage, or to reward the provision or retention of business or a business advantage, or in explicit or implicit exchange for favours or benefits;
- it complies with local law;
- it is given in St Joseph's College's name, not in a worker's name;
- it does not include cash or a cash equivalent (such as gift certificates or vouchers);
- it is appropriate in the circumstances. For example, in the UK it is customary for small gifts to be given at Christmas time;
- taking into account the reason for the gift, it is of an appropriate type and value and given at an appropriate time;
- it is given openly, not secretly; and
- gifts should not be offered to, or accepted from, government officials or representatives without the prior approval of the Head, College Deputy Head (Prep), College Deputy Head (Senior) or Bursar.

We appreciate that the practice of giving business gifts varies between countries and regions and what may be normal and acceptable in one region may not be in another. The test to be applied is whether in all the circumstances the gift or hospitality is reasonable and justifiable. The intention behind the gift should always be considered.

### **What is Not Acceptable?**

It is not acceptable for workers (or someone on their behalf) to:

- give, promise to give, or offer, a payment, gift or hospitality with the expectation or hope that an advantage for St Joseph's College will be received, or to reward an advantage already received;
- give, promise to give, or offer, a payment, gift or hospitality to a government official, agent or representative to "facilitate" or expedite a routine procedure;
- accept payment from a third party that they know or suspect is offered with the expectation that it will obtain an advantage for them;
- accept a gift or hospitality from a third party if they know or suspect that it is offered or provided with an expectation that a business advantage will be provided by [insert school name] in return;
- threaten or retaliate against another worker who has refused to commit a bribery offence or who has raised concerns under this policy; or
- engage in any activity that might lead to a breach of this policy.

### **Donations**

St Joseph's College only makes charitable donations that are legal and ethical under local laws and practices. No donation must be offered or made in St Joseph's College's name or on behalf of St Joseph's College without the prior approval of the Head or Bursar.



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### **Workers' Responsibilities**

Workers must ensure that they read, understand and comply with this policy.

The prevention, detection and reporting of bribery and other forms of corruption are the responsibility of all those working for us or under our control. All workers are required to avoid any activity that might lead to, or suggest, a breach of this policy.

A worker must notify the Bursar or Head as soon as possible if he/she believes or suspects that a breach of this policy has occurred or may occur in the future.

Any employee who breaches this policy will face disciplinary action, which could result in dismissal for gross misconduct. We reserve our right to terminate our contractual relationship with other workers if they breach this policy.

### **Record-keeping**

The Financial Controller of St Joseph's College keeps financial records and has appropriate internal controls in place which will evidence the business reason for making payments to third parties.

All Employees must make their line manager aware and keep a written record of all hospitality or gifts accepted or offered, which will be subject to managerial review.

Workers must ensure all expenses claims relating to hospitality, gifts or expenses incurred to third parties are submitted in accordance with St Joseph's College's expenses policy and specifically record the reason for the expenditure.

All accounts, invoices, memoranda and other documents and records relating to dealings with third parties, such as clients, suppliers and business contacts, should be prepared and maintained with strict accuracy and completeness. No accounts must be kept "off-book" to facilitate or conceal improper payments.

### **How to Raise a Concern**

Workers are encouraged to raise concerns about any issue or suspicion of malpractice at the earliest possible stage. Concerns should be reported by following the procedure set out in our Whistle Blowing Policy.

### **Protection**

Workers who refuse to accept or offer a bribe, or those who raise concerns or report another's wrongdoing, are sometimes worried about possible repercussions. St Joseph's College aims to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken.



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St Joseph's College is committed to ensuring no one suffers any detrimental treatment as a result of refusing to take part in bribery or corruption, or because of reporting in good faith their suspicion that an actual or potential bribery or other corruption offence has taken place, or may take place in the future. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If a worker believes that he/she has suffered any such treatment, he/she should use the College's Grievance Procedure.

### **Training and Communication**

Training on this policy is to form part of the induction process for all new workers. All existing workers will receive regular, relevant training on how to implement and adhere to this policy as part of INSET annually.

### **Regulatory Framework**

A legal Requirement

The Bribery Act 2010

The Public Interest Disclosure Act 1998

The Economic Crime and Corporate Transparency Act (ECCT) 2023

### **References:**

The Bribery Act (Adequate Procedures) guidance published on 30 March 2011 under Section 9 of the Bribery Act 2010.

The Bribery Act Prosecution guidance (published by the Serious Fraud Office on 30 March 2011).

The Whistleblowing Policy under the Public Interest Disclosure Act 1998

### **Review**

This policy is to be reviewed annually.

### **Annexes**

A. Financial Limits and Procedures for gifts and hospitality.

### **Appendix**

1. Declaration of Hospitality Sponsorship or Gifts.



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**ANNEX A – Financial Limits and Procedures for Gifts and Hospitality**

**Procedure to be followed for gifts**

It is not the intention of this policy to prevent the giving of small items, such as chocolates or inexpensive gifts, by students or parents to College staff as a gesture of esteem and goodwill; nor is it intended to prevent charitable giving to Helping Hands or departmental funds held on trust.

<b>Examples of gifts and the actions that should be taken are given below. It is not possible to provide examples of every circumstance and staff should take advice from their line manager or from the Bursar if in any doubt.</b>	<b>Acceptable</b>	<b>Conditions/action required</b>
Chocolates or small gifts to College staff from parents or students	Yes	None so long as value does not exceed £100
Diaries or calendars	Yes	None so long as value does not exceed £100
Stationery or other minor office items	Yes	None so long as value does not exceed £100
Gifts of cash or vouchers to go towards departmental or charitable funds	Yes	Must be banked immediately through the Finance Office
Personal gifts of cash	No	Not acceptable under any circumstances
Several small gifts from the same source within the space of 12 months totalling more than £100	No	Subsequent gifts must be refused, declared and entered into the register
Larger gifts such as food hampers or cases of wine	No	Offers must be refused, declared and entered into the register

All gifts or offers of gifts, other than those of a minor nature as indicated above, must be declared on the appropriate form (see Appendix 1) and sent to the Bursar. The form is available on the Staff Documents area or can be obtained on request from the Finance Office.

Where gifts are provided from a Form or Class as a group, then the value must not exceed a multiple of the above limits per student included.



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**Procedure to be followed for hospitality, including sponsorship**

All staff must bear in mind the possibility of bribery and must exercise extreme caution where accepting hospitality from suppliers or potential suppliers could be construed as hampering their strict independence or impartiality. Gifts and hospitality can be used as a subterfuge for bribery and, if this is suspected, staff should consult the Anti-Bribery Policy. Where there is any doubt in the matter, the offer of hospitality or sponsorship should be declined and declared on the appropriate form (see Appendix 1).

Where there is no suggestion of bribery but staff are unsure as to whether an offer of hospitality or sponsorship is acceptable, they should escalate the query in the first instance to their direct line manager. If line managers are in any doubt they must escalate the query to the Head or Bursar, who will consult the Management Group where necessary.

Examples of hospitality and the actions that should be taken are given below. It is not possible to provide examples of every circumstance and staff should take advice through the routes outlined above if in any doubt.

<b>Example</b>	<b>Acceptable</b>	<b>Conditions/action required</b>
Working lunches with existing suppliers on College premises	Yes	None
Hospitality (e.g. lunch, dinner) whilst attending trade fairs or conferences	Yes	Must be declared and entered into the Register, indicating value
Sponsorship of College training events	Yes	A written agreement must be in place and the sponsorship disclosed in any papers relating to the meeting, including any minutes taken
Personal sponsorship to attend trade or training events	Yes	Must be approved in advance, declared and entered into the Register Value up to £2,500 to be approved by Head
Hospitality off College premises, e.g. working dinner, whether outside or within normal working hours	Yes	Only where College business is conducted that could not be performed on site / in working hours. Must be approved in advance by the Head, declared and entered into the Register. Staff should also consider whether the hospitality is over and



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		above that which could reasonably be considered as normal
Entertainment from an existing supplier to mark a special occasion e.g. installation of new equipment	Yes	Must be approved in advance, declared and entered into the Register All such special occasions must be discussed first with, and approved by, the Head.
Entertainment of any sort whilst the College is in the process of procuring goods or services from the supplier	No	Any offers must be declined, declared and entered into the Register
Use of commercial premises for holidays or private purposes	No	Any offers must be declined, declared and entered into the Register
Visits to supplier sites paid for by the supplier at a time when the College is procuring goods or services	No	Any offers must be declined, declared and entered into the Register. If such visits are necessary the costs must be met by the College to ensure absolute probity: therefore prior approval will be required through the normal route for approval of expenditure

Where hospitality or sponsorship is accepted, it must in all cases be approved **in advance** according to the authorisation levels set out above. Where the value is over £5,000, it must be approved in advance by the Head and the Finance and General Purpose Committee.

Following the approval or otherwise of acceptance of the offer of hospitality or sponsorship, a declaration must be made using the appropriate form (see below) and sent to the Bursar. The form can be found on the Staff Documents area or can be obtained on request from the Finance Office.

### Private transactions

Under no circumstances must staff benefit privately from having official business with suppliers of goods and services. No favour or preference as regards price or otherwise, which is not available to the general public, can be sought or accepted.



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**Register of gifts and hospitality**

The College will maintain a register of gifts and hospitality, which will be held by the Financial Controller.

The register will be monitored for compliance by the Bursar and will be reviewed annually by the Finance and General Purposes Committee.



## DECLARATION OF HOSPITALITY/SPONSORSHIP/GIFTS

Name.....

Position.....

Department.....

Date.....	
Nature of *hospitality / *sponsorship / *gift offered to you (*delete as applicable)	
Value of above	£
External body offering hospitality / sponsorship / gift	
Date of hospitality / sponsorship / gift	
Hospitality/ sponsorship/ gift accepted or declined (refer to policy)	
Approval considered by (refer to policy for authority levels)	Approval given: *Yes / *No Name: Role: Signature:

**(Please send form to the Financial Controller)**

\*Delete as appropriate