

GIFTS AND BRIBERY

COSRT POLICY

OVERVIEW

COSRT actively discourages the acceptance of any gifts by employees, whether in cash or kind, from any customer, client, supplier or any person connected with COSRT.

Bribery is the accepting of gifts, money, hospitality or other favours in return for providing something of value to the briber. The purpose of this policy is to set out the rules that must be followed in this College to ensure that no bribery occurs.

The following behaviour is unacceptable, and must not occur in this College:

- accepting any financial or other reward from any person in return for providing some favour
- offering any financial or other reward from any person in return for providing some favour.

From time to time, customers, clients, suppliers or other persons might offer a gift to an employee. This could be a small item, or something of considerable value.

All gifts, however small, must be reported to the CEO and recorded. No gifts which have more than a nominal value, typically less than £100, may be accepted. If a gift is offered above this value it should be politely refused at the time and this must be reported to the CEO.

From time to time, customers, suppliers or other persons might invite an employee to a hospitality event. All such invitations must be reported to the CEO and permission must be given before an employee accepts any invitation.

Any employee who is concerned that he or she is potentially being bribed should report this matter to the CEO immediately.

Any employee found to have offered or accepted a bribe will face disciplinary action.

If an employee is concerned that acts of bribery are occurring in COSRT they should inform the CEO in the first instance. If this course of action is inappropriate, the employee should inform the Trustees.



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