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GRAY'S INN SQUARE

Anti-Bribery and Corruption Policy



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1. Policy statement

4–5 Gray’s Inn Square is committed to conducting its professional and business activities honestly, fairly, independently and with integrity. Chambers adopts a zero-tolerance approach to bribery, corruption and improper influence in any form.

Chambers will not offer, promise, give, request, agree to receive or accept any bribe, inducement, reward, facilitation payment, improper gift, hospitality or other advantage intended to influence professional judgement, obtain or retain business, secure an improper advantage, or compromise the independence of any barrister, pupil barrister, employee, contractor, supplier or other person associated with Chambers.

This policy supports Chambers' compliance with the **Bribery Act 2010**, the **Bar Standards Board Handbook**, and relevant Bar Council guidance for chambers. It is also intended to help Chambers maintain appropriate, proportionate procedures to prevent bribery and corruption in line with the Ministry of Justice's six principles: **proportionality, top-level commitment, risk assessment, due diligence, communication and training, and monitoring and review.**

2. Purpose of this policy

The purpose of this policy is to:

1. set out Chambers' position on bribery and corruption;
2. explain the responsibilities of members, pupils, staff, contractors and suppliers;
3. provide guidance on gifts, hospitality, donations, expenses and conflicts of interest;
4. identify bribery and corruption risks relevant to a barristers' chambers;
5. explain how concerns must be reported and handled;
6. protect Chambers, its members and staff from legal, regulatory, disciplinary and reputational risk.

The Bar Council recommends that a chambers anti-bribery and corruption policy should prohibit bribery and corruption, be tailored to chambers' own risks, include guidance on gifts, hospitality and donations, and explain how those acting for chambers should conduct business, including contract negotiations and conflicts of interest.

3. Scope

This policy applies to:

- all members of Chambers;
- door tenants, associate members and consultants, where applicable;
- pupil barristers;
- clerks and administrative staff;
- temporary staff, secondees, interns and volunteers;
- contractors, consultants, agents, suppliers and service providers acting for or on behalf of Chambers;
- any other person associated with Chambers for the purposes of the Bribery Act 2010.

For the avoidance of doubt, self-employed barristers remain individually responsible for their own professional conduct, regulatory compliance and legal obligations. However, Chambers expects all members and associated persons to comply with this policy when acting in connection with Chambers, Chambers' administration, business development, marketing, procurement, client relationships or professional practice.

4. Legal and regulatory framework

The Bribery Act 2010 creates four principal offences:

1. offering, promising or giving a bribe;
2. requesting, agreeing to receive or accepting a bribe;
3. bribing a foreign public official;
4. failure by a commercial organisation to prevent bribery by a person associated with it.

A bribe may include money, gifts, hospitality, entertainment, services, preferential treatment, donations, employment opportunities, introductions, discounts, travel, accommodation, or any other advantage.

The offence may occur even if the bribe is not ultimately paid, accepted or successful. It may also occur where the benefit is offered indirectly through a third party.

This policy also supports compliance with the BSB Handbook, including the duties to act with honesty and integrity and to maintain independence, which the Bar Council expressly links to anti-bribery and corruption controls.

5. Chambers' risk profile

Chambers is a set of self-employed barristers supported by clerking and administrative staff. Its core activities consist of the provision of legal services and advocacy. Chambers' supply chains are limited and predominantly UK-based, including professional services, IT services, office supplies and facilities management. Chambers has previously assessed its modern slavery supply chain risk as low because of the nature of its activities and supplier base.

Nevertheless, bribery and corruption risks may arise in areas including:

- allocation or referral of work;
- relationships with professional clients, solicitors, intermediaries, experts, consultants or lay clients;
- gifts, hospitality or entertainment offered to or by members, clerks or staff;
- business development, marketing events, sponsorships or networking;
- procurement of Chambers services, IT, property, facilities or professional support;
- fee negotiations, discounts, billing arrangements or payment handling;
- interactions with public bodies, courts, tribunals, regulators or overseas entities;
- recruitment, pupillage, mini-pupillage, tenancy decisions or work experience opportunities;
- charitable donations, political donations or sponsorship;
- conflicts between personal interests and professional duties.

Chambers considers its overall bribery and corruption risk to be **low to moderate**, but recognises that even low-risk organisations must maintain appropriate controls.

6. Prohibited conduct

No person covered by this policy may:

1. offer, promise, give, request, agree to receive or accept a bribe;
2. make or accept facilitation payments;
3. offer or accept gifts, hospitality or entertainment intended to influence professional judgement or business decisions;
4. provide improper benefits to secure instructions, referrals, favourable listing, procurement decisions or other commercial advantage;
5. reward or induce a solicitor, intermediary, public official, expert, supplier or other third party for improper preferential treatment;
6. use personal relationships, donations, sponsorship or employment opportunities to obtain an improper advantage;
7. conceal or misrepresent gifts, hospitality, payments, expenses, donations or conflicts of interest;
8. retaliate against anyone who reports a genuine concern.

7. Gifts and hospitality

Chambers recognises that modest, proportionate and transparent gifts or hospitality may form part of normal professional relationships. However, gifts and hospitality must never be used to influence, reward or appear to influence professional judgement, independence, referrals, procurement decisions or the allocation of work.

7.1 Acceptable gifts and hospitality

A gift or hospitality may be acceptable where it is:

- reasonable, proportionate and infrequent;
- openly given and properly recorded where required;

- consistent with professional courtesy;
- not cash or a cash equivalent;
- not offered during a tender, procurement decision, recruitment process, sensitive negotiation or active dispute where it could create a perception of improper influence;
- not likely to compromise independence, integrity or professional judgement.

Examples may include modest refreshments at a professional meeting, low-value seasonal gifts, or reasonable hospitality at a legal, educational or networking event.

7.2 Unacceptable gifts and hospitality

Gifts or hospitality must be refused where they:

- are cash, vouchers, loans or cash equivalents;
- are lavish, excessive or disproportionate;
- are secretive or undocumented;
- are conditional on receiving instructions, referrals, favourable treatment or business advantage; are offered by or to someone involved in an active procurement, recruitment, tender, complaint, disciplinary matter or case-related decision;
- could reasonably be perceived as compromising independence or integrity;
- could embarrass Chambers if publicly disclosed.

7.3 Gifts and hospitality register

Chambers will maintain a **Gifts and Hospitality Register**.

The following must be recorded:

- all gifts or hospitality offered, accepted or declined with an estimated value above **£50**;
- any repeated gifts or hospitality from the same source, regardless of individual value;
- any gift or hospitality that may give rise to a perceived conflict of interest;
- any gift or hospitality offered by a supplier, intermediary, solicitor, client or potential client in connection with Chambers' business.

The register should include:

- date offered or received;
- name of giver and recipient;
- nature and estimated value;
- reason or context;
- whether accepted, declined, returned or donated;
- approval obtained, where applicable.

Prior approval from the **Senior Clerk** or **Heads of Chambers** must be obtained for gifts or hospitality likely to exceed **£100**, or where there is any doubt.

8. Facilitation payments

Facilitation payments are unofficial payments made to secure or speed up routine actions, such as administrative approvals, processing, listing, permits or services.

Chambers prohibits facilitation payments. This applies regardless of local custom or practice.

If a person is asked to make a facilitation payment, they must refuse unless there is an immediate threat to personal safety. Any request or payment made under duress must be reported immediately to the Senior Clerk or Heads of Chambers and recorded.

9. Donations, sponsorship and political contributions

Chambers will not make charitable donations, sponsorship payments or political contributions for the purpose of obtaining or retaining business, securing instructions, influencing decision-making or gaining an improper advantage.

Any Chambers donation or sponsorship must be:

- transparent;
- lawful;
- approved by the Heads of Chambers or delegated authority;
- properly recorded;
- proportionate and consistent with Chambers' values;
- subject to appropriate checks where there is any risk of improper influence.

Chambers does not make political donations.

Members acting in a personal capacity must ensure that any personal donation, sponsorship or political activity is not represented as being made on behalf of Chambers unless expressly authorised.

10. Procurement and supplier relationships

Chambers will seek to work with reputable suppliers and service providers who conduct business lawfully and ethically.

Those involved in procurement, supplier selection or contract negotiation must:

- act objectively and in Chambers' best interests;
- avoid undisclosed conflicts of interest;
- not accept inducements, personal benefits or improper hospitality;
- ensure that supplier decisions are based on quality, value, suitability, reliability and risk;
- conduct proportionate due diligence for higher-value or higher-risk suppliers;
- include appropriate anti-bribery expectations in supplier arrangements where relevant.

Where appropriate, Chambers may request confirmation that suppliers comply with applicable laws and ethical standards. This is consistent with Chambers' published approach to working with reputable suppliers and requesting compliance confirmations where appropriate.

11. Professional clients, lay clients and intermediaries

Members, clerks and staff must not offer, request, accept or provide any improper advantage in connection with:

- receiving instructions;
- referral of work;
- allocation of work within Chambers;
- fee negotiation;
- recommendations to clients;
- introductions to solicitors, intermediaries or other professional contacts;
- listing, ranking, directories, awards or testimonials;
- settlement, case strategy or evidence.

Any referral arrangement, commission, marketing arrangement or introduction fee must be lawful, transparent, professionally appropriate and approved in advance by Chambers where it involves Chambers' name, resources or administration.

Barristers must also ensure that any arrangement complies with their individual obligations under the BSB Handbook.

12. Public officials and overseas dealings

Care must be taken in dealings with public officials, courts, tribunals, regulators, local authorities, government departments, state-owned bodies, overseas lawyers, public agencies or international organisations.

No gift, hospitality, payment or advantage may be offered to a public official with the intention of influencing them in their official capacity.

Any proposed hospitality, event invitation, travel support or payment involving a public official must be approved in advance by the Heads of Chambers or Senior Clerk.

13. Conflicts of interest

A conflict of interest may create or increase bribery and corruption risk. Members, pupils, clerks and staff must disclose any actual or potential conflict involving:

- a personal, family or financial relationship with a supplier, client, solicitor, intermediary or other third party;
- involvement in procurement or contract decisions where there is a personal interest;
- gifts or hospitality from a person connected with a current or potential matter;
- offers of employment, work experience, pupillage, tenancy or other opportunities linked to business advantage;
- charitable, political or sponsorship relationships that may influence or appear to influence decisions.

Conflicts must be reported to the Senior Clerk or Heads of Chambers and recorded as appropriate.

14. Expenses

Expenses must be genuine, reasonable, proportionate and supported by receipts or other appropriate evidence.

Expenses must not be used to disguise gifts, hospitality, entertainment, donations, referral payments or improper inducements.

False, inflated or misleading expenses claims may be treated as misconduct and may also constitute fraud.

15. Responsibilities

15.1 Heads of Chambers

The Heads of Chambers are responsible for:

- setting the tone of zero tolerance towards bribery and corruption;
- approving this policy;
- ensuring Chambers maintains proportionate anti-bribery controls;
- considering serious concerns or breaches;
- ensuring appropriate review and oversight.

15.2 Senior Clerk / Chambers Management

The Senior Clerk and Chambers management are responsible for:

- day-to-day implementation of this policy;
- maintaining the Gifts and Hospitality Register;
- ensuring staff and relevant members understand the policy;
- overseeing supplier and procurement controls;
- escalating concerns to the Heads of Chambers;

- keeping appropriate records.

15.3 Members of Chambers

Members are responsible for:

- complying with this policy when acting in connection with Chambers;
- maintaining their independence and professional integrity;
- ensuring gifts, hospitality, introductions and referral relationships are appropriate;
- reporting concerns promptly;
- complying with their individual legal and regulatory obligations.

15.4 Pupil barristers

Pupil barristers must comply with this policy and seek guidance from their pupil supervisor, Senior Clerk or Heads of Chambers if they are offered gifts, hospitality or any advantage that may raise a concern.

15.5 Staff, contractors and suppliers

Staff, contractors and suppliers must comply with this policy when acting for or on behalf of Chambers. Suppliers may be required to confirm their compliance with anti-bribery laws and Chambers' ethical expectations.

16. Reporting concerns

Anyone who knows or suspects that bribery, corruption or improper conduct has occurred must report it promptly.

Reports may be made to:

- the **Heads of Chambers**;
- the **Senior Clerk**;
- the **Practice Manager / Chambers Director**, if applicable;
- another appropriate senior member of Chambers where the concern involves one of the above.

Examples of reportable concerns include:

- being offered a gift or benefit to influence a decision;
- being asked to make an unofficial payment;
- a supplier offering personal benefits during contract negotiations;
- a solicitor, intermediary or client suggesting payment or reward for instructions;
- hospitality that appears excessive or targeted at influencing work allocation;
- unexplained invoices, inflated expenses or unusual payment requests;
- pressure not to record a gift, payment, donation or hospitality.

Reports will be handled sensitively and, where possible, confidentially. Chambers will not tolerate victimisation or retaliation against anyone who raises a genuine concern in good faith.

17. Investigation and response

Chambers will take all reported concerns seriously.

Depending on the nature of the concern, Chambers may:

- make internal enquiries;
- require gifts or hospitality to be returned or declined;
- suspend or terminate supplier relationships;
- take disciplinary action in relation to staff;

- refer conduct concerns involving barristers to appropriate regulatory processes;
- seek legal advice;
- report matters to law enforcement, regulators or other authorities where required.

If criminal conduct is suspected, Chambers will consider whether a report should be made to the police, Serious Fraud Office or other appropriate authority. GOV.UK guidance states that suspected bribery or corruption should be reported to the police in the first instance, with the SFO and National Crime Agency having roles in international bribery and corruption matters.

18. Record keeping

Chambers will keep accurate records relating to:

- gifts and hospitality;
- donations and sponsorships;
- supplier due diligence;
- procurement decisions;
- conflicts of interest;
- reported concerns and outcomes;
- training and communication of this policy.

Records must be complete, accurate and not misleading. No person may falsify, conceal or destroy records to hide bribery, corruption or improper influence.

19. Training and communication

Chambers will communicate this policy to members, pupils, staff and relevant contractors.

Training or guidance will be provided where appropriate, particularly for:

- clerks and staff involved in client relationships, procurement or billing;
- members involved in Chambers management;
- those arranging events, hospitality or sponsorship;
- pupils and new joiners;
- anyone involved in higher-risk activities.

20. Monitoring and review

This policy will be reviewed at least annually, or sooner if:

- there is a change in law, regulation or Bar Council guidance;
- Chambers' structure, practice areas or risk profile changes;
- a bribery or corruption concern is reported;
- weaknesses are identified in current controls;
- new suppliers, business development activities or overseas risks arise.

The review will consider:

- entries in the Gifts and Hospitality Register;
- reported concerns;
- supplier and procurement risks;
- effectiveness of training and communication;
- whether thresholds and controls remain proportionate.

21. Breach of this policy

Breach of this policy may result in:

- internal action by Chambers;
- disciplinary action for employees;
- termination of contracts or supplier relationships;
- referral to the BSB or other professional regulator;
- civil or criminal liability;
- reputational harm to Chambers and the individuals involved.

Serious breaches may amount to criminal offences under the Bribery Act 2010.

22. Practical decision-making test

Before offering or accepting any gift, hospitality, payment, benefit, donation or favour, ask:

1. Is it lawful?
2. Is it modest, proportionate and transparent?
3. Could it influence, or appear to influence, professional judgement?
4. Could it compromise independence or integrity?
5. Would I be comfortable if this were recorded in Chambers' register?
6. Would I be comfortable if this were reported to the Heads of Chambers, the BSB, a court, a client or the press?

If the answer to any question causes concern, the item must not be offered or accepted without prior approval.

23. Approval

This policy was approved by the Heads of Chambers.

Signed:

Heads of Chambers 4–5
Gray's Inn Square

Date: [Insert date]



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Please Press Button for Entry

To get in touch

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