

HARPER ADAMS UNIVERSITY COLLEGE

IMPORTANT NOTICE FOR SUPPLIERS, CONTRACTORS PARTNERS AND CLIENTS

Anti-Bribery and Corruption

1. Harper Adams University College has established policies, regulations and procedures, with the aim of ensuring that the highest standards of openness, probity and accountability are maintained in the conduct of all aspects of its business. They apply to all members of the University College's staff and to other individuals, including members of the University College's Board of Governors and the Directors and employees of the University College's subsidiary companies.
2. These regulations and procedures also apply to any person undertaking any business with the University College and all wholly owned subsidiaries or any person acting on their behalf (whether under contract or not) and are available to suppliers, contractors and clients on request.
3. Suppliers, contractors, consultants (including third party representatives), clients and partner organisations should note that a failure on the part of an employee or a person associated with the University College or its subsidiary companies (an 'associate'), to comply with University College policy and regulations relating to bribery and corruption, including the regulations relating to interests, benefits and gifts, may be a disciplinary matter and are strongly advised, therefore, to ensure that their actions do not compromise an employee or associated person.

Declarations by Suppliers, Contractors and Clients

4. To ensure that the University College is able to demonstrate the highest level of probity in its business dealings, suppliers, contractors and clients must declare in writing, any interest, personal relationship or other matter which might compromise or reasonably be deemed to compromise any relationship or contract with the Harper Adams University College or its subsidiary companies. Where an employee/associate of the University College or of its subsidiary companies has declared an interest in the company or organisation, the University College Secretary or Director of Finance (acting on behalf of the Independent Committee on Bribery and Corruption established by the University College) may judge that interest to be of sufficient significance to warrant the exclusion of the company or organisation from the list. Their decision may be reviewed by the Principal. The Principal's decision shall be final.

Declarations by Staff

5. All employees of the University College or its subsidiaries and any other persons carrying out any duties for the University College are required to declare, in the context of carrying out such duties, any interest, including any matter that confers, or could reasonably be deemed to confer, directly or indirectly, an advantage, claim or legal share and/or any personal benefit. Suppliers, contractors and clients are also required to declare, in the context of their relationship with the University College, any interest which could or does affect their relationship with the University College.

Personal Gifts

6. Suppliers, contractors and clients should note that with the exception of items of very small intrinsic value, such as business diaries or calendars, those employed by or associated with the University College or its subsidiary companies, **are not permitted to accept personal gifts** and are, nevertheless, required to declare any personal gift which is offered to them. As a general principle, the University College discourages suppliers, contractors and clients from making gifts to persons employed or associated with the University College.

Where a visitor to the University College from overseas wishes to make a presentation of a gift of small intrinsic value to a member of staff and to refuse the gift would cause offence, the staff member should accept the gift on behalf of the University College and display the gift in his/her

office or where appropriate in the display case in the Main Building. The staff member must also declare the gift to the Director of Finance for recording in the Register of Gifts kept by his office.

It should be noted that the offering of any personal gift or hospitality of an inappropriate type which could reasonably be construed as being intended to induce the University College to enter into or maintain a relationship will be regarded as an inducement. Inducements are prohibited and staff must refuse such gifts without giving offence.

Under no circumstances should a staff member accept a gift of money.

Staff are required to seek advice from the University College Secretary or Director of Finance if they are unsure whether to accept a gift or not.

Hospitality

7. The University College's regulations place certain restrictions on employees/associates with regard to the acceptance of offers of hospitality which take place during and/or outside normal working hours. Staff may, therefore, refuse offers of hospitality and are asked to do so without giving offence.

Breaches of the Policy

8. The University College reserves the right, at its absolute discretion, to terminate any relationship or contract in cases where an inducement has been offered/accepted and also where a matter has been declared after taking place which would make it inappropriate for the University College to continue with the relationship/contract.

Dr C E Baxter
University College Secretary
July 2011