Anti-Bribery and Corruption

The University of Hertfordshire Higher Education Corporation 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’s staff and to other individuals, including members of the University’s Board of Governors and the Directors and employees of the University’s subsidiary companies. These regulations and procedures also apply to any person undertaking any business with the University (whether under contract or not) and are available to suppliers, contractors and clients on request.

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 or its subsidiary companies (an ‘associate’), to comply with University 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 associate.

Declarations by suppliers, contractors and clients

To ensure that the University 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 University of Hertfordshire or its subsidiary companies.

Interests
All employees of the University and any other persons carrying out any duties for the University 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, any interest which could or does affect their relationship with the University.

Personal Gifts
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 or its subsidiary companies are not permitted to accept personal gifts but are, nevertheless, required, in certain circumstances, to declare any personal gift which is offered to them. As a general principle, the University discourages suppliers, contractors and clients from making gifts to persons employed or associated with the University.

Hospitality
The University’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.

Inducements
The offering of any personal gift or hospitality of an inappropriate type which could reasonably be construed as being intended to induce the University to enter into or maintain a relationship will be regarded as an inducement. Inducements are prohibited.

Facilitation Payments

Facilitation payments are defined as small payments made to expedite the performance of routine
administrative functions to which the person making the payment is entitled.

Members of the University are forbidden to make or accept Facilitation Payments.

The University 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 to continue with the relationship/contract.

List of approved suppliers and contractors

A company or organisation will not be included on the University's list of approved suppliers or contractors where an employee/associate of the University or of its subsidiary companies has declared an interest in the company or organisation and the Secretary and Registrar of the University judges that interest to be of sufficient significance to warrant the exclusion of the company or organisation from the list.

How to make a declaration and how this information will be held by the University

Declarations must be made in writing:

in a confidential letter, marked ‘Register of Interests’, addressed to:

Secretary and Registrar
University of Hertfordshire
College Lane
Hatfield
Herts
AL10 9AB

or by e-mail to:  

j.hughes20@herts.ac.uk

Information and advice may be obtained on request from the Head of Governance Services, University of Hertfordshire (Telephone: 01707 285126, e-mail: j.hughes20@herts.ac.uk).

The information provided will be held on the relevant University Register of Interests in accordance with the provisions of the Data Protection legislation and University regulations.

Sue Grant
Secretary and Registrar
14 November 2019