

# CODE OF CONDUCT FOR ANTI-BRIBERY AND CORRUPTION

*Important notice for suppliers, contractors, partners and clients*

## Anti-Bribery and corruption

The University of Kent is committed to conducting its business fairly, honestly and openly, to the highest standards of integrity, and in accordance with all legal requirements. The University has a policy on Bribery and Corruption that also applies to Contractors and is in accordance with the Bribery Act 2010, which all contractors should be aware of. They apply to all members of staff. The policy can be found on [www.kent.ac.uk/governance/policies-and-procedures/bribery.html](http://www.kent.ac.uk/governance/policies-and-procedures/bribery.html)

In addition to the University policy, these regulations and procedures apply to any person undertaking any business with the Estates Department or any person acting on their behalf (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 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 associated person.

## Declarations by suppliers, contractors and clients

To ensure that the Estates Department 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. Where an employee/associate of the University has declared an interest in the company or organisation, the University Director of Estates 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 Executive Group. The Executive Group decision shall be final.

## Declarations by staff

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 small intrinsic value, those employed by or associated with the University, 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 discourages suppliers, contractors and clients from making gifts to persons employed or associated with the University.

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 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 must seek advice from the Director of Estates if they are unsure whether to accept a gift or not.

## Hospitality

The University 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

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.

**Peter Czarnomski**  
Director of Estates