

Corporate and Social Responsibility Business Conduct Policy

The University is committed to the highest standards of openness, integrity and accountability. It seeks to conduct its affairs in a responsible manner having regard to the principles established by the Committee on Standards in Public Life (formerly known as the Nolan Committee) which members of staff at all levels are expected to observe.

In addition, the University expects that staff at all levels will observe the spirit of this Business Conduct Policy, the University's Financial Regulations, the Guide to Policy and Procedures, the Procurement Policy and Procedures, the detailed financial guides and the Code of Good Practice – Valuing Ourselves and Others, which cover:

- Probity and propriety
- Selflessness, objectivity and honesty
- Relationships

Refusal to observe the codes of conduct will be grounds for disciplinary action.

Conflicts of Interest

University staff must never use their authority or office for personal gain and must seek to uphold and enhance the standing of the University by:

- i) maintaining an unimpeachable standard of integrity in all their business relationships;
- ii) fostering the highest possible standards of professional purchasing competence;
- iii) optimising the use of resources to provide the maximum benefit to the University;
- iv) complying both with the letter and spirit of:
 - a) English law, including the UK Bribery Act;
 - b) professional procurement guidance issued by the Head of Procurement;
 - c) contractual obligations entered into by the University.
- v) rejecting any business practice which might reasonably be deemed improper. In particular, staff should not put themselves in a position where their behaviour might give rise to concern in the context of the Bribery Act 2011. An overview of the Bribery Act is at Annex 1.

Corporate and Social Responsibility Business Conduct Policy

Any personal interest which may impinge or might reasonably be deemed by others to impinge on an employee's impartiality in any matter relevant to their duties must be declared.

Additionally, a member of Council, or a member of staff, having a material, personal, financial or other beneficial interest in any transaction between the University and third parties shall disclose his or her interest in writing in advance of any discussion or decision regarding that transaction. In the case of a member of Council, the disclosure should be made to the Secretary to the Council and in the case of a member of staff to their Head of School or Directorate.

In particular, no person shall be a signatory to a University contract where he or she also has an interest in the activities of the other party.

Fraud

The University is, and wishes to be seen by all, as being honest and opposed to fraud in the way it conducts its business. The University has developed a fraud policy which sets out policy and procedures for dealing with risk or fraud or corruption. Any member of staff who identifies a fraud (actual or potential) should immediately report it to either the Secretary of Council or the Head of Internal Audit Services. They will then pursue the matter in line with the University's Fraud Response Plan.

Gifts and Hospitality

Staff should be aware of, and follow, the University's Gifts and Hospitality Policy.

Confidentiality

The confidentiality of information received in the course of business must be respected and must never be used for personal gain. Information given in the course of business must be true and fair and never designed to mislead.

Corporate and Social Responsibility Business Conduct Policy

Summary

For more information on the various documents referred to in this policy, please go to:

- Procurement Policy and Procedures
- Fraud Policy and Fraud Response Plan
- Gifts and Hospitality Policy
- Expenses and Benefits Policy
- Code of Good Practice – Valuing Ourselves and Others
- Financial Regulations
- University Guide to Policies and Procedures

This policy statement was agreed by the University Senior Management Board on 5 December 2011.

D C L Savage
Director of Finance and Corporate Services