

Disclosure of Gifts and Hospitality Procedure

This procedure sits under the Gift and Hospitality Policy

Brief Description & Purpose:	This procedure sets out how staff, governors, students and third parties working for the University can comply with the requirements of the Gifts and Hospitality Policy.		
Applicable to (list cohorts):	Staff: All staff, including Governors and co-opted Board Committee Members	Students: N/A	Third Parties: All who are in a formal relationship with the University or who may enter into such a relationship
Effective From:	13 March 2019	Last reviewed date:	9 May 2023
Executive Owner:	Georgina Bailes	Next review date:	May 2026
Business Owner:	Richard Elliott	Publication External Y/N	Y
Contact for queries:	Richard Elliott		

1. Introduction

1.1 These procedures apply to all staff, governors, students and third parties acting on behalf of the University and to all University activities undertaken in the UK or overseas.

1.2 The University expects all Northumbria staff, Governors and co-opted Board Committee Members to record all gifts and hospitality given to, or received from, third parties (including those declined) within the University's [Gifts & Hospitality Register \(staff access only\)](#).

1.3 The Register promotes transparency around exchanges of gifts and hospitality, provides a robust audit trail and could assist individuals in defending themselves against allegations of impropriety. Suitably anonymised, it may be used for reporting and disclosure purposes, including Freedom of Information requests. Staff are also encouraged to undertake the University's Business without Bribery training, available via the eLearning Gateway, which covers the use of gifts and hospitality.

1.4 The Gifts and Hospitality Policy and Procedure do not apply to philanthropic gifts and donations to the University, from third parties not currently or not likely to be in a formal relationship with the University, which are managed by Alumni Engagement via the University's [Philanthropic Gifts and Donations Policy](#)

2. Items that can be offered or accepted and approvals required

2.1 Gifts may range from token gifts of little value to a substantial gift of higher value. Typical modest gifts given or received include business branded stationery, flowers, confectionery and other promotional items. Gifts offered by the University should not exceed £50 in total per instance of giving, (£50 per recipient in the case of hospitality); account should

be taken of the potential external perception of the nature and timing of hospitality, particularly around key decision points of any associated activity.

2.2 Token or very low value gifts (e.g. estimated at less than £10 in value) do not need to be recorded on the Register unless they are perceived as a possible inducement or become a regular pattern of giving.

2.3 Typical hospitality includes lunches, dinners, accommodation or entertainment, and free places at business conferences for which there would otherwise be a charge, and which may include meals, drinks and accommodation, and range from token hospitality of little value such as providing food and drink (e.g. a working lunch) to high value activities such as a ticket and entertainment for a sporting event or concert. Generally offers of such higher-value activities should be politely declined unless there is a direct link to specific University business; the offer and the fact that it was declined should still be recorded in the [Gifts & Hospitality Register](#).

2.4 Personal retention of gifts is not permitted where it is clear that the giver intended the gift to be given to the University rather than an individual. Where the intention is not clear and depending on the nature of the gift, the recipient's line manager should consider whether the gift is retained by the individual to whom it was given, or the Faculty or Service (for example, to be put on display).

2.5 Approvals

2.5.1 Approval is required for any gifts or hospitality:

- intended for a foreign public official (e.g. Government ministers, diplomats, embassy staff and international border officials), irrespective of value and whether provided in the UK or abroad*;
- where the value of the gift and/or hospitality exceeds £50 (NB: for hospitality purposes, this means £50 per person). A gift valued or estimated at more than £50 should not normally be retained personally unless this has been explicitly approved by a Faculty PVC or Service Chief Officer or Director;

2.5.2 It is a specific offence under the Bribery Act 2010 to offer an inducement to a foreign public official anywhere in the world so particular care is required when offering gifts and/or hospitality.

2.5.3 Retrospective approval should be in exceptional circumstances only such as gifts from foreign public officials or visitors which may not be known about in advance.

3. Unacceptable items

3.1 Any gift of hospitality that does not meet the principles defined in the Gifts and Hospitality Policy (3.3 Principles for offering or receiving gifts and hospitality) (LINK) should NOT be accepted or offered. This includes:

- Gifts of money;
- Gifts of giftcards/vouchers or other items which are in effect money (NB: these are sometimes used for payments to research participants but are not classed as "gifts" hence this Policy does not apply to them);
- Multiple gifts offered, whether simultaneously or in close succession, to/from the same third party from/ to the same staff member once
- Gifts and hospitality must not be provided for political campaigning purposes as this would breach the University's charitable obligations;

- Meals, entertainment or accommodation which have no business purpose
- Excessive hospitality (estimated value of >£100 per person) or including substantial amounts of alcohol;
- Gifts and hospitality where the timing could be considered to be an inducement or bribe e.g. during contract negotiation or before an exam;

4. How to declare and record Gifts and Hospitality

4.1 All gifts and hospitality received or offered should be recorded on the online [Gifts and Hospitality register](#)

4.2 The information that will need to be recorded in the Register includes:

- Description and purpose of the gift or hospitality;
- Date Given/Received;
- Value/estimated value;
- The current location (gifts only);
- Name of the third party individual/organisation involved;
- Nature of relationship with the University;
- Whether the third party is a Foreign Public Official (e.g. Government Minister or official, MPs, diplomats, international border crossing guards etc);
- Whether the gift/hospitality was accepted or declined or accepted and donated to charity, recording which charity if that is the outcome.

4.3 Once submitted your line manager will receive a notification to approve the submission.

4.4 Disclosures will be reviewed annually by the Head of Governance and Secretary to the Board where the activity in question is still ongoing. Clarification or further information may be requested by Governance Services based on submissions made.

5. Questions to ask if you suspect an inducement or bribery

5.1 If you are unsure whether the gift or hospitality offered to you is a bribe, consider the following factors:

- Might there be a particular intent behind the gift/hospitality?
- Would you feel obliged, now or in the future, to act differently as a result of the gift/hospitality?
- Has the offer been made to others in your party or just one or two individuals?

5.2 A good rule of thumb is to ask yourself if you would feel able to openly admit to accepting such an offer, e.g. to your line manager. If in any doubt at all, do not accept the offer.

5.3 If it is clear that the gift or hospitality offered to you IS intended as a bribe OR if you are offered a gift or hospitality as a reward for a previous decision that you made in favour of the party offering the gift/hospitality:

- You should refuse it and tell the person offering it that it is against the University's policies.
- In such circumstances, you should report the incident immediately to your line manager and to the Head of Governance and Secretary to the Board.
- Record in the Gifts & Hospitality Register who offered you the bribe, what was offered, what was expected in return and that the offer was declined.

6. How to raise a concern

6.1 It is important to remain vigilant and report concerns related to suspicious activity. Since the use of inducements or rewards are common in some countries, it is recognised that some concerns will arise from time to time. All individuals should use the process below to report any suspected fraud, bribery or other corrupt behaviour.

- University staff should report suspicions to their Line Manager and their Principal Budget Holder (i.e. their Faculty PVC or Service Chief Officer or Director), who will notify either the Chief Financial Officer or the Head of Governance and Secretary to the Board.
- Third parties (e.g. contractor staff) should notify their Line Manager of any concerns and/or the main University contact for the project or contract.

6.2 Concerns should be communicated in writing but may be made orally in exceptional circumstances. The report should provide details of who offered the bribe, what was offered, what was expected in return and that the offer was declined, including any evidence supporting the concern.

6.3 If, for any reason, reporting via the Line Manager or main University contact is considered inappropriate (e.g. if the concern relates to them) or their response is considered to be unsatisfactory, then a report may be made directly to the Head of Governance or to the Vice-Chancellor if the issue involves the Head of Governance. The concern will then be treated under the University's [Public Interest Disclosure \(Whistleblowing\) Policy](#).

7. Related Policies, Guidance and Other Resources

- [Gifts and Hospitality Policy](#)
- [Disclosure and Management of Conflicts of Interest Policy](#)
- [Scenarios and Mitigations Guidance](#)
- [Disclosure and Management of Conflicts of Interest Policy](#)
- [Travel and Expenditure Policy \(staff access only\)](#)
- [Counter-Fraud and Bribery Policy](#)
- [Anti-Money Laundering, Terrorist Financing and Sanctions Policy](#)
- [Public Interest Disclosure \("Whistleblowing"\) Policy](#)
- [Equality and Diversity Policies](#)
- [Financial Regulations \(staff access only\)](#)
- [Staff Code of Conduct and Disciplinary Procedures for Staff and Senior Post-Holders \(staff access only\)](#)
- [Philanthropic Gifts and Donations Policy](#)

8. Key Contacts

Service/Team	Responsibility
Faculty or Service Line Manager	Queries relating to Gifts and Hospitality
Governance Services	Advice on complex or potentially sensitive cases