

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 co-opted Board members should 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: N/A
Effective From:	13 March 2019	Last reviewed date:	3 September 2024
Executive Owner:	Georgina Bailes, Secretary to the Board and Director of Governance	Next review date:	September 2027
Business Owner:	Beth Lenney, Governance Manager	Publication External Y/N	Y
Contact for queries:	Beth Lenney		

1. Introduction

1.1 These procedures apply to those listed above on behalf of the University and to all University activities undertaken in the UK and overseas.

1.2 The University requires 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, if necessary, could assist in responding to 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 [NU People and Finance](#), 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 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. Hospitality can be offered to external guests and visitors within the rates per person specified in the policy (2.4) and taking into account the following considerations:

- where possible a staff to external guest or visitor ratio of one to one or less should be maintained, although it is recognised that this will not always be possible.
- For VIP guests and visitors where it is considered appropriate to exceed these limits approval should be gained in advance, refer to 2.5 Approvals;
- the cost of partners of staff or guests will not usually be covered unless it is necessary that official visitors are accompanied by their partners/spouses;
- where the hospitality is to be reimbursed via the General Expenses Policy and Procedure, the most senior colleague present should pay the bill and submit the reimbursement claim with receipts;
- alcoholic drinks with dinner and at hospitality events are permitted in moderation, both amount and cost;
- the intended benefits to the University should be included on the Gifts and Hospitality register and a list of attendees attached.

2.4 Normally personal retention of gifts is not permitted unless agreed as an exception by the FPVC or Service Director. Further guidance can be given by the Director of Governance.

2.5 Approvals

2.5.1 Approval by Faculty PVC or Service Chief Officer or Director is required for any gifts or hospitality and this should be requested by email and attached to the declaration on the Gifts and Hospitality Register as set out in section 2.4 of the Gifts and Hospitality Policy.

2.5.2 Where the value of the gift and/or hospitality exceeds £50 (NB: for hospitality purposes, this means £50 per person) the Gifts and Hospitality Register will automatically forward the details to the relevant approver for their review. Additional email approval will also be required for gifts and hospitality intended for a foreign public official. You will receive an email informing you of whether it has been accepted, rejected or if the approver requires additional information about the request before making a decision.

2.5.3 *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.

3. Unacceptable items

3.1 Any gift or hospitality that does not meet the principles defined in section 2.4 of the Gifts and Hospitality Policy should NOT be accepted or offered.

4. How to declare and record Gifts and Hospitality

4.1 All gifts and hospitality received or offered above £10 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 Faculty or Service approver will receive a notification to consider the submission.

4.4 Disclosures will be reviewed periodically by the Director of Governance and Secretary to the Board.

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

5.1 Since the use of inducements or rewards are common in some countries, it is recognised that some concerns will arise from time to time. 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:

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

5.4 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](#).

6. Related Policies, Guidance and Other Resources

The following relevant policies and procedures are available on the [University Policy Page](#)

- Disclosure of Gifts and Hospitality Procedure
- Disclosure and Management of Conflicts of Interest Policy

- Scenarios and Mitigations Guidance
- Finance Regulations and related policies
- 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](#)

[Philanthropic Gifts and Donations Policy](#)

7. 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

8. Version

Version No.	Reviewer	Date	Changes
1.1	Dr Adam Dawkins & Susan O'Donnell	12 March 2018	
1.2	Georgina Bailes & Richard Elliott	26 May 2023	Policy format and structure update; financial thresholds reviewed; wording refinement.
2.0	Jane Embley, Georgina Bailes & Richard Elliott	6 September 2024	Policy reviewed and updated in line with revisions to General Expense Policy.
2.1	Clare Stogden	July 2025	Updated Business Owner