

<b>Gifts and Hospitality Policy</b>		<b>Ref: SGE009</b>	
<b>Brief Description &amp; Purpose:</b>	Sets out the principles that apply when staff, Governors or third parties are offered or intend to offer gifts and/or hospitality as part of an existing or potential business relationship, and to guide in judging the appropriateness of gifts. Links to detailed guidance are also provided.		
<b>Applicable to (list cohorts):</b>	<b>Staff:</b> All staff, including Governors and co-opted Board Committee Members	<b>Students:</b> n/a	<b>Third Parties:</b> All who are in a formal relationship with the University or who may enter into such a relationship
<b>Effective From:</b>	13 March 2019	<b>Approved date:</b>	March 2019
<b>Approval Authority:</b>	Employment & Finance Committee	<b>Last reviewed date:</b>	26 May 2023
<b>Executive Owner:</b>	Georgina Bailes	<b>Next review date:</b>	May 2026
<b>Business Owner:</b>	Richard Elliott	<b>Publication External Y/N</b>	Y

## 1. Introduction

1.1 The giving or receiving of gifts and hospitality is acknowledged to be part of normal business or as a means of fostering and developing relationships. The Policy sets out the principles and requirements expected of staff, and third parties in a formal relationship with the University in offering and receiving gifts and hospitality to ensure this is done in a way that stands up to both internal and public scrutiny.

1.2 Reward and incentive schemes which the University offers to its own staff, governors or students are not covered by this policy. Philanthropic gifts and donations offered to, and accepted on behalf of, the University from third parties not currently or not likely to be in a formal relationship with the University are covered by the [Philanthropic Gifts and Donations Policy](#).

1.3 It is a specific offence under the Bribery Act 2010 to offer an inducement to a foreign public official anywhere in the world, e.g. Government ministers, diplomats, embassy staff and international border officials. Additional care is required to avoid such gifts or hospitality being perceived as an inducement and to avoid allegations of misconduct and impropriety. The University will not tolerate any instances of the giving and taking of gifts and hospitality that contravene the Bribery Act 2010.

## 2 Policy Detail

2.1 The offer and acceptance of gifts and hospitality - a normal business courtesy - can give rise to difficulty, particularly in light of the requirements of the Bribery Act 2010. The offering and receiving of gifts must be approved in advance by the Faculty Pro-Vice Chancellor or Service Chief Officer or Director, with guidance from the Head of Governance and Secretary to the Board as required. The offer of a gift from foreign public officials or visitors may not be known in advance, in which case retrospective approval should be sought. Further information on approval requirements is detailed the [Gifts and Hospitality Procedure](#)

2.2 Staff, governors and third parties who are in a formal relationship with the University or who may enter into such a relationship must declare and record gifts and hospitality received and offered (even if declined) under this Policy.

2.3 In the course of University business, staff and associated third parties may offer or receive gifts and hospitality which are reasonable and proportionate to the business being undertaken provided that they support the University's values of academic excellence, collaboration, inclusivity, innovation and ambition and are consistent with the Seven Principles of Public Life of selflessness, integrity, objectivity, accountability, openness, honesty, and leadership.

2.4 Care must be taken to avoid gifts or hospitality being seen as an inducement and to avoid allegations of misconduct and impropriety using the following provisions;

- The offer of gifts and corporate hospitality must have a demonstrable link to the work of the University and represent good value for money, by following relevant guidance in the University's Travel and Expenditure Policy and utilising University branded goods as appropriate;
- Gifts and hospitality offered to foreign public officials must be demonstrably and directly connected to the conduct of University business and must be reasonable and proportionate to the business being conducted;
- Staff must not accept gifts or hospitality that might be perceived to compromise their integrity or professionalism or could give rise to the perception that decisions may be influenced as a result of their receipt. This includes gifts from students where there is a direct academic relationship that could be perceived to be affected by such a gift;
- gifts or hospitality must not be offered or given secretly;
- Staff must avoid offering or receiving gifts and hospitality around key decision milestones such as student admissions, assessment or awards, or key milestones of procurement exercises.

2.5 In circumstances where declining a gift or hospitality may cause offence (e.g. gifts from foreign dignitaries or officials), the gift or hospitality may be accepted. Such gifts and whether they will be used, displayed or donated should be considered and approved by the Faculty Pro-Vice Chancellor or Service Chief Officer or Director. Details should be recorded in the Register including the end recipient e.g. Charitable cause.

2.6 When University staff also have roles in other organisations, this should be declared and recorded under the Disclosure and Management of Conflicts of Interests Policy. Any gifts and hospitality received and offered as part of such a role should be addressed under the policies of the organisation in question rather than through this Policy.

2.7 Examples, scenarios and recommended actions are provided in the guidance ([Scenarios and Mitigations Guidance](#)) and further information on offering or receiving gifts and hospitality is detailed in the Gifts and Hospitality procedure. If colleagues are unsure about whether to receive or offer gifts and hospitality, or they have any suspicions in relation to gifts and hospitality proposed to be offered or received, they should consult with their line manager for initial advice. In complex or potentially sensitive cases guidance is available from the Head of Governance and Secretary to the Board or Governance Manager.

### 3. Key Roles and Responsibilities

Role	Responsibility
	Approval of any gift given to a member of staff with an estimated or known value of over £50 (or £50 per person for hospitality.)

Service Chief Officer or Faculty Pro- Vice Chancellor	Retrospective approval should be in exceptional circumstances only.
	Advance approval for all gifts and hospitality offered to or by (where possible) foreign public officials.
	Ensure that the requirement for the use and accuracy of the Gifts and Hospitality Register is communicated to staff in their areas.
Head of Governance and Secretary to the Board and Governance Manager	<p>The Head of Governance and Secretary to the Board is the main source of advice on the operation of this Policy and is responsible for:</p> <ul style="list-style-type: none"> <li>• The communication of the University's Policy on Corporate Gifts and Hospitality;</li> <li>• Seeking assurance from Faculty Pro-Vice Chancellors (FPVCs) and Service Chief Officers that this policy is understood and being enforced at a local level.</li> </ul>

#### 4. Definitions

**Gift:** an item or other benefit given by the University or one of its staff members or other representatives to another person or organisation or vice-versa which could be readily tradeable. Gifts may range from token gifts of little value to a substantial gift of higher value. Common modest gifts given or received include business and branded stationery, flowers, confectionery, gift cards and other promotional items.

**Hospitality:** refers to the entertainment and related arrangements that the University may offer to another person or organisation or vice-versa. Common hospitality includes lunches, dinners, accommodation or entertainment, and range from token hospitality of little value such as providing food and drink (e.g. a working lunch) to higher 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.

#### 5. Related Policies, Procedures and Other Resources

Other relevant policies and procedures linked with this Policy include:

- [Disclosure of Gifts and Hospitality Procedure](#)
- [Disclosure and Management of Conflicts of Interest Policy](#)
- [Scenarios and Mitigations Guidance](#)
- [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](#)

## 6. 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.