

Gifts and Hospitality Policy			
Brief Description & Purpose:	Sets out the principles that apply when staff, Governors and co-opted Board Committee Members are offered or intend to offer gifts and/or hospitality as part of an existing or potential business relationship. Links to detailed guidance are also provided.		
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	Approved date:	March 2019
Approval Authority:	People Committee (previously Employment and Finance Committee)	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

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 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 Rewards and incentives offered by the University 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. Colleagues who offer or receive gifts and/or hospitality must follow the requirements of the Bribery Act 2010.

2 Policy Detail

2.1 It is recommended that everyone covered by this Policy undertakes the Business Without Bribery online training.

2.2 The offering and receiving of gifts must be approved in advance by the relevant Faculty Pro-Vice Chancellor, Service Director, or Vice-Chancellor, with guidance from the and Secretary to the Board and Director of Governance 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 in the [Gifts and Hospitality Procedure](#)

2.2 Colleagues 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 perceived as an inducement or reward 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, represent good value for money, and utilise University branded goods as appropriate;
- Purchases of gifts and hospitality must follow the University's Financial Regulations and procurement policies and any claims for reimbursement must be in accordance with the General Expenses Policy and Procedures;
- 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;
- The maximum cost of hospitality offered to external guest and visitors without specific approval from Service Director or Faculty Pro-Vice Chancellor is
 - £30 per person for lunch or
 - £45 per person for dinner.
- Alcoholic drinks are permitted in moderation of both amount and cost with dinner. The cost of any partners of staff or guests will not be covered unless it is necessary that official visitors are accompanied by their partners;
- 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, refer to the [Scenarios and Mitigations guidance](#);
- 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 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 Director of Governance and Secretary to the Board or Governance Manager.

3. Key Roles and Responsibilities

Role	Responsibility
Service Director or Faculty Pro- Vice Chancellor	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.) Retrospective approval should be in exceptional circumstances only Approval of hospitality offered to VIP guests over the stated maximum levels in 2.4.
	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.
Director of Governance and Secretary to the Board and Governance Manager	The Director of Governance and Secretary to the Board is the main source of advice on the operation of this policy and is responsible for: <ul style="list-style-type: none"> • The communication of the University’s policy on Corporate Gifts and Hospitality; • Seeking assurance from Faculty Pro-Vice Chancellors (FPVCs) and Service Chief Officers that this policy is understood and being enforced at a local level.

4. Definitions

Gift: an item or other benefit given **on behalf of** the University 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 higher-value activities should be politely declined unless there is a direct link to specific University business.

5. Related Policies, Procedures 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](#)

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.
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 and links