



Gifts & Hospitality Policy

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1. Introduction

1. This policy sets out the University's expectations of its staff and members of Court on the giving and receiving of gifts and hospitality. It also makes clear who is required to maintain a register of gifts and hospitality that have been declared under the policy. The policy should be read in conjunction with the University's Anti-Bribery Policy Statement¹.
2. The acceptance of gifts and excessive hospitality can cause damage to the University's reputation and may lead to prosecution under the Bribery Act 2010. This policy seeks to protect staff and lay members of Court (and any additional lay members of its Committees) from the suspicion of dishonesty as well as from the perception that their decision-making may have been influenced as a result of the acceptance or provision of gifts or hospitality. By doing so, the policy aims to ensure staff are free from any conflict of interest.

Definitions

3. Gifts are items or services given or received for which no payment has been made in return or where the item or service has been accepted or provided at a level clearly below an appropriate market value.
4. Hospitality can be defined as any food, drink, accommodation or entertainment which has been provided either without charge or at a heavily discounted rate.

Principles

5. All staff and members of the University Court must not accept, solicit or offer any personal benefit as an inducement or reward for taking specific action or for showing favour or disfavour to any other person. This includes the acceptance or solicitation of benefits on behalf of other related parties, such as partners, spouses, other family members or colleagues.
6. Moreover, staff must not accept gifts or hospitality or benefits of any kind if it might be perceived that their personal integrity or professionalism has been compromised, or that their decisions may have been influenced, or if they or the University might be seen to be placed under an obligation.
7. These principles notwithstanding, the University accepts that there may be circumstances where the unsolicited acceptance of gifts or hospitality will be appropriate, or indeed where declining such gifts or hospitality may cause offence that is detrimental to the University's interests.
8. The University expects its staff and also the members of the University Court to exercise the utmost care when giving and accepting gifts and hospitality when on University business. In particular, care should be taken when accepting a gift or hospitality from a person who, or organisation which, has or hopes to have a contract with the University.

¹ [Anti-Bribery Policy](#)

Additionally, staff should take especial care when giving and accepting gifts or hospitality from a person who, or an organisation which, might be perceived to be seeking to gain academic advantage or influence. This will include, but is not limited to, such circumstances as acceptance onto a programme of study, assessing a student's work, or the interpretation or provision of favourable research results.

9. If, having previously accepted a gift or hospitality, a member of staff finds him or herself in a position where a decision might be construed as having been influenced by the acceptance of that gift or hospitality, the resulting conflict of interest should be declared in accordance with the table at Appendix 1.
10. The guiding principle is that the gift or hospitality should be proportionate and appropriate to the circumstances in which it is offered or received. Staff should at all times avoid the risk of accepting or providing gifts or hospitality which might be perceived as immoderate, excessive or extravagant, whether by members of the University or the public.
11. Lay members of Court (alongside any additional lay members of its Committees) have a particular responsibility in relation to gifts or hospitality which are offered or received in fulfilment of duties relating to activities with their employer or with an organisation other than the University. In accepting or offering such gifts or hospitality, lay members should carefully consider whether doing so may lead to a perception that their decision-making in relation to University business or their personal integrity may be unduly affected. In such cases, lay members should consider declaring these gifts or hospitality to the University, alongside any gifts or hospitality they may have received by virtue of their role as a lay member. Careful thought needs to be given as to whether it may be more prudent to decline such gifts or hospitality.

2. Guidance

General

12. Before accepting unsolicited gifts, hospitality or other benefits and irrespective of the guidance given below, staff have a personal responsibility to consider in every case whether acceptance might put them in breach of the principles outlined above. Where this is, or may be perceived to be the case, staff should politely decline.

Receiving Gifts

13. Staff may accept gifts of low intrinsic value (generally taken to be below £30), such as tokens of gratitude; promotional and corporate gifts bearing the institutional or organisational logo or name of the giver; or books (including e-books) from publishers to academic staff where the books are relevant to the academic and/or professional interests of the staff concerned.
14. Gifts of greater than low intrinsic value should on the whole be declined or returned. All such gifts, whether declined or accepted, must be reported to the Dean or School Manager of School or Director of a professional services directorate, as appropriate, to be entered into a Register of Gifts & Hospitality (see below). Deans, School Managers and Directors of Professional Services must report such gifts to their respective line managers, the Vice-Principals and Secretary to the Principal, and the Principal and lay members of the

University Court to the Director of Academic & Corporate Governance (see Appendix 1 for detailed reporting structure).

15. Advice on whether a gift of greater than low intrinsic value can be accepted should be sought in the first instance from the relevant Dean, Director or School Manager and thereafter from the Director of Academic & Corporate Governance, Director of Legal or the University Secretary.
16. Gifts of greater than low intrinsic value that are nevertheless accepted should normally be regarded as the property of the University and used or retained accordingly. It should be normal practice for such items, as well as any low value gifts of particular prominence, to be included within the University's museum collection, and contact should be made with the Curator of Museum Services to discuss whether this is appropriate. Such gifts should nevertheless be included on the Register of Gifts & Hospitality and note made of the action taken.
17. Personal gifts of money (or monetary instruments) should never be accepted regardless of amount. Gifts of money to the University should be received only if they are clearly charitable donations, co-ordinated through the Principal, the Director of Finance or the Director of External Relations.

Receiving Hospitality

18. Modest hospitality, provided it is reasonable in the circumstances, such as lunches or other meals in the course of working visits, is generally acceptable provided its acceptance is consistent with the principles set out above. Such hospitality should normally be similar to the scale of hospitality that the University would be likely to offer in similar circumstances.
19. Staff attendance at sporting, cultural or similar events at the invitation of suppliers, potential suppliers or consultants is not generally acceptable to the University. Similarly, the acceptance of invitations by suppliers, potential suppliers or consultants to participate in social, sporting and similar activities (for example golf days or activity days) is not generally acceptable to the University.
20. Regardless of whether it is accepted or declined, hospitality which falls outwith what is generally acceptable must be declared in the same way as for gifts as set out above and likewise entered into a Register of Gifts & Hospitality. In the same way, advice in cases of doubt should be sought from the relevant Dean, Director or School Manager and thereafter from the Director of Academic & Corporate Governance, Director of Legal or the University Secretary.

Providing Gifts or Hospitality

21. Business gifts, including hospitality, may on occasion be provided by the University. This would normally be acceptable in circumstances where external or international visits take place and gifts are exchanged as a means of cementing goodwill, or as tokens of gratitude.
22. In this regard, gifts should normally be of a type and value which fall within the guidance set out above for the acceptance of gifts, and especially in accordance with the description given at paragraph 11.

23. Hospitality provided to external visitors should likewise fall within the description set out above for the receipt of hospitality, and in particular in accordance with paragraph 16.
24. Where gifts or hospitality are offered that fall outside the definitions and scope of the above principles and guidance, these must be entered into a Register of Gifts & Hospitality.

3. Register of Gifts & Hospitality

25. In the interests of transparency, Deans, Directors and School Managers must ensure that local Registers of Gifts & Hospitality are kept within their areas of responsibility.
26. Each Register should record the following:
 - Description and nature of gift or hospitality;
 - Whether the gift or hospitality was received or provided by a member of the University;
 - Value or estimated value;
 - Name of individual/company providing the gift or hospitality;
 - Whether the gift was accepted or declined;
 - Date of receipt;
 - Name of individual/company who received the gift, and if a University employee, whether personally or on behalf of the University;
 - The circumstances within which the gift or hospitality was offered.
27. In the case of members of the University Court (and lay members of any other of its Committees) and of the University Executive Group, gifts and hospitality should be recorded in the Corporate Register held by the Director of Academic & Corporate Governance. This register will be publicly available on the University's website.
28. Each local register shall be reported annually, or on request, to the Director of Academic & Corporate Governance for onward reporting to the University Audit Committee, as appropriate.
29. Failure to declare gifts or hospitality or failure to include them timeously on the Register of Gifts & Hospitality may constitute misconduct, particularly where acceptance or provision of such gifts or hospitality calls into question the integrity of the individual receiving or offering such gifts or hospitality or where as a result the University is brought into disrepute.

Recipient/Provider	Who to report to	Which Register
Academic Staff within Schools	Dean	School Register
Professional Services Staff within Schools	School Manager	School Register
Deans	Vice-Principal (Provost)	School Register
School Managers	Director of Academic & Corporate Governance	School Register
Staff within Directorates	Director of Service	Directorate Register
Directors of Professional Services (except members of UEG)	University Secretary	Directorate Register
Vice-Principals	Principal	Corporate Register (held by ACG)
Secretary and the Directors of Finance, HR & OD and External Relations	Principal	Corporate Register (held by ACG)
Principal	Director of Academic & Corporate Governance	Corporate Register (held by ACG)
Lay Members of Court	Director of Academic & Corporate Governance	Corporate Register (held by ACG)
Lay Members of Court Committees	Director of Academic & Corporate Governance	Corporate Register (held by ACG)

4. Document Information

Document Name	Gifts & Hospitality Policy
Status	Approved
Responsible officer/department/school	ACG
Policy owner	Audit Committee
Date last approved	11.06.2018
Due for renewal	2020
Information classification: public/internal	Public
Location in repository	Court
Approval route and history	Court 11.06.2018 Audit Committee 22.05.2018
Code	CRT180611_G&H_Policy.v2