



## Gifts and Hospitality Policy

<b>Classification</b>	Policy
<b>Version number:</b>	12-01
<b>Status</b>	Approved
<b>Approved by:</b>	Council
<b>Approval date:</b>	04 July 2024
<b>Effective from:</b>	05 July 2024
<b>Next review date:</b>	05 July 2027
<b>Document author:</b>	Governance Officer
<b>Document owner:</b>	Governance Manager
<b>Contact:</b>	Governance
<b>Collaborative provision:</b>	Mandatory <i>State whether this document is applicable to the University's collaborative partners</i>
<b>Related documents:</b>	Anti-bribery and Corruption Policy; Code of Conduct for Council Members
<b>University document:</b>	Yes <i>A University document applies across the institution, is approved by a committee of Council or Senate and is held in the University Policy Directory on SharePoint.</i>
<b>Published location:</b>	University Policy Directory SharePoint

- All printed or downloaded versions of this document are classified as uncontrolled

# Gifts and Hospitality Policy

## Table of Contents

1	Introduction.....	1
2	Scope.....	1
3	Definitions.....	1
4	Principles .....	1
5	Disclosure .....	1
6	Consequences of non-compliance.....	2
7	Training .....	2
8	Version Control.....	3
9	Appendix A: Self-approval threshold.....	4
10	Appendix B: Appropriate authorities .....	4

## Gifts and Hospitality Policy

### 1 Introduction

- 1.1 This document sets out the University's policy on the receipt and provision of gifts and hospitality.
- 1.2 This policy aims to ensure compliance with the Bribery Act 2010, by safeguarding the University and relevant parties against bribery and corruption.

### 2 Scope

- 2.1 This policy applies to all employees and volunteers, members of Council and its committees and any third parties acting on behalf of the University.
- 2.2 This policy applies to all University activity, irrespective of location.
- 2.3 Under the terms of this policy, individuals identified in 2.1 are accountable for any gifts or hospitality received by a family member which may influence, or be perceived to influence, the decision-making or judgement of said individual.

### 3 Definitions

- 3.1 A gift is any item, service, or benefit offered, provided, or received without direct financial compensation in return. It can include physical objects, vouchers, discounts, or other forms of value.
- 3.2 Hospitality is any entertainment, meal, accommodation, travel expense, or other form of hosting offered, provided, or received without direct financial compensation in return.

### 4 Principles

- 4.1 All actions associated with the receipt and provision of gifts and hospitality should be:
  - a. conducted with the highest ethical standards;
  - b. transparent and disclosed, as outlined in this policy; and
  - c. reasonable and proportionate in value and intent.

### 5 Disclosure

- 5.1 The receipt or offer of gifts and hospitality must be declared to:
  - a. the recipient's line manager; or
  - b. an appropriate authority. (see Appendix B)
- 5.2 The receipt or offer of gifts and hospitality directly from a student, or via a third party on behalf of a student, is exempt from the requirements of 5.1 and must instead be declared to:
  - a. the recipient's line manager or Head of School as applicable; and
  - b. any decision-making body that enables the recipient to influence decisions regarding the student (e.g. exam board).
- 5.3 Gifts and hospitality exceeding the self-approval threshold (see Appendix A) must be accurately documented.

- 5.4 The provision of gifts and hospitality requires prior approval from:
  - a. the provider's line manager; or
  - b. an appropriate authority. (see Appendix B)
- 5.5 Provisions must:
  - a. adhere to the values prescribed by the self-approval threshold (see Appendix A); and
  - b. be accurately documented.
- 5.6 Gifts and hospitality offered by any individual or organisation involved in a procurement or tender process with the University must be declined.
- 5.7 Cash gifts or cash equivalents are strictly prohibited.
- 5.8 Accurately documenting unacceptable gifts and hospitality does not make them permissible.
- 6 Consequences of non-compliance**
- 6.1 Failure to adhere to this policy may result in disciplinary action, up to and including termination of employment or contractual relationships.
- 6.2 Under the provisions of the Bribery Act 2010, severe penalties may be imposed for individuals and organisations found guilty of bribery. Individuals may face imprisonment and fines, while organisations may be subjected to unlimited fines.
- 7 Training**
- 7.1 The University will provide training and awareness programmes to ensure that all relevant parties are familiar with this policy and its implications.

## 8 Version Control

Version	Author	Date approved	Relevant sections
11.1	Governance Manager	18/11/2014	-
12-00	Governance Officer		
12-01	Governance Manager	26/06/24	Updated following ULT feedback

## **9 Appendix A: Self-approval threshold**

9.1 The self-approval threshold is defined as:

- a. £50 for a single gift;
- b. £100 for hospitality; and
- c. £200 for the cumulative total of gifts and hospitality received by an individual from a single party over a rolling 12-month period.

## **10 Appendix B: Appropriate authorities**

10.1 The following are identified as appropriate authorities for matters relating to the receipt and provision of gifts and hospitality:

- a. Head of Procurement
- b. Director of Finance
- c. Chief Finance Officer
- d. University Secretary and Chief Compliance Officer
- e. Deputy Vice-Chancellor
- f. Vice-Chancellor
- g. Chair of Council