



BISHOP GROSSETESTE UNIVERSITY

Document Administration

Document Title:	Gifts & Hospitality Policy
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Reason for development:	<p>This Policy applies to all staff and Council members and aims not just to safeguard the position of the company by demonstrating its freedom from corruption, but also give protection to staff against personal embarrassment and criticism.</p> <p>The Gifts and Hospitality Policy – Receiving and Providing aims to make clear the limited circumstances in which Hospitality can be received or provided.</p> <p>BGU Financial Regulations state: “Staff and members of the University Council must not accept any personal benefit as an inducement or reward for taking any action (or specifically not taking action) in his or her position in the University or for showing favour (or disfavour) to anyone in his or her position in the University”.</p> <p>This policy is designed to help staff and Council members comply with the above and seeks to protect staff and BGU from accusations showing favour to any organisation or person.</p> <p>The policy also aims to ensure that conduct in relation to gifts and hospitality is compliant with the Bribery Act 2010.</p>
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***This document remains valid until formally revoked or replaced by the University.**

GIFTS AND HOSPITALITY POLICY

1. The University is aware that in the course of normal business transactions with external contacts, whether they are conducted in the UK or abroad, there may be occasions where employees provide or receive gifts or hospitality. Employees must be aware of the potential for the legitimate use of the gift or hospitality to be misinterpreted and this policy aims to prevent any improper behaviour arising, especially in light of the requirements of the Bribery Act. This policy should also be read in conjunction with the University's Anti-corruption, Fraud and Bribery policy.

As a general guideline, business gifts and hospitality should not be accepted by members of staff.

2. The intention of the policy is to ensure that the University can demonstrate that no undue influence has been applied or could be said to have been applied by any supplier or anyone else dealing with the University. The University should be able to show that all decisions are reached on the basis only of value for money and for no other reason. Any consideration of whether or not the principles of the Policy have been breached will be determined by reference to this principle.
3. Any breach of this policy could lead to disciplinary action.
4. Employees shall not use their authority or office for personal gain and shall seek to uphold and enhance the standing of the University for:
 - Maintaining an unimpeachable standard of honesty and integrity in all their business relationships;
 - Complying with the letter and spirit of the law, and contractual obligations;
 - Rejecting any business practice that might be deemed improper;
 - At all times in their business relationships acting to maintain the interests and good reputation of the University.

Breaches of the Policy

5. Any employee who becomes aware of a breach of policy must report this immediately to his or her line manager (or to a member of SLT) who will instigate investigations as necessary. Members of staff are advised to note that alleged breaches of this policy will be investigated under the relevant Disciplinary Procedure, and could also amount to an offence under the Bribery Act.

Guidelines

6. In applying this policy the guidance set out below must be followed.

Declaration of Interest

7. Any personal interest that may impinge or might reasonably be deemed by others to impinge on an employee's impartiality or conflict with the duty owed to the University in any matter relevant to an employee's duties (such as conflicting business interests) should be declared in writing (see paragraph 10). Any member of staff who is aware of any business dealings conferring personal gain or involving relatives or associates of members of staff must supply details of such transactions to the Clerk of Council for the University's records. These records are available at all times to the Auditors. In addition, staff involved in tender exercises will be asked to sign a Conflict of Interest Declaration Form, which will be held as part of the Procurement documentation but forwarded to the Clerk of Council as necessary.

Senior members of staff and University Council members must also provide a Register of Financial Interests return and a Certificate of Interests in Transactions with the University and with BG (Lincoln) Limited return at the end of each financial year (FRS 8 “Related Part Transactions”).

Receiving Business Gifts and Hospitality

8. As a general guideline, business gifts and hospitality should not be accepted by members of staff.
9. Employees are permitted to accept gifts, rewards or benefits from members of the public or organisations with which the University has official contacts only:
 - Where they are isolated gifts of a trivial character (circa £10 to £15 in value), or inexpensive seasonal gifts (such as diaries or calendars). Gifts should therefore not be accepted if they appear to be disproportionately generous or could be construed as an inducement to affect a business decision. Offers of cash gifts, gift vouchers or special discounts, which are not normally available to other employees, are not to be accepted.
 - In relation to conventional hospitality (lunches, outings, tickets for events, etc) , such invitations should not therefore be accepted where there is no reasonable business justification for doing so, where an invitation is disproportionately generous, or where the invitation could be seen as an inducement to affect a business decision.
 - The University does not encourage the acceptance of gifts from students or their relations. However, there may be occasions when students make token gifts to staff, such as a box of chocolates or similar of a low intrinsic value, in appreciation of the support received during their studies which employees feel unable to refuse. Employees may accept such gifts but must declare them to their line manager.
 - Where to refuse a gift might reasonably be interpreted as giving offence or causing embarrassment, the gift should be accepted on behalf of the University, provided the recipient is satisfied that it is not being offered in return for any favour. Receipt of such gifts should be reported as soon as practicable to the Head of Department who shall enter them on a register as required at Section 11. The Head of Department shall decide whether the recipient may retain the gift, whether the University should retain it, whether it should be disposed of e.g. to charity or, exceptionally, returned to the donor with an explanatory letter.
10. A Register of Gifts and Hospitality’ to record all hospitality or gifts (other than of a nominal/trivial value or facilities provided during the normal course of business), offered to employees, whether accepted or declined, shall be established and maintained by the Director of Finance. This record shall be open to inspection by the Auditors. In case of doubt it is better to declare the benefit than not to.
 - Any gift whose value is not trivial (i.e. more than £15) must be declared.
 - Normal purchasing rules, including tendering where required, must apply in deciding all purchases. Free gifts must not be accepted in place of discounts.
 - Where purchased items include a “free gift”, such a gift above £15 in value must be either used for University business or handed to the Head of Finance to be pooled for use at University-organised or charity raffles etc. Air miles and similar benefits earned through official travel should not be used for private purposes. Any Air Miles accrued from travel on University business must only be used to offset the costs of future official journeys.
11. To evidence compliance with the Bribery Act and prevent any grounds for suspicion the Register of Gifts and Hospitality should record:
 - The nature of the gift or hospitality accepted or declined
 - Name of the provider

- Who it was offered to (staff name)
- Date of receipt
- Estimated value
- Method of Disposal

Purchasing Gifts or Providing Hospitality

- 12 Members of staff are able to offer meals, drinks and hospitality for a business-related function to external contacts / organisations as long as the offer of hospitality is appropriate and proportionate to the business being transacted and is not seen, especially by the recipient(s), as being in some way an inducement to influence a business-related decision.
- 13 The cost of hospitality should be reasonable, and prior authorisation from member of staff's line manager should be obtained prior to the hospitality / entertainment being booked and offered to an external contact / organisation.
- 14 Where hospitality / entertainment is offered this should be within the University campus using University services. If it is necessary to use external facilities to provide the hospitality / entertainment prior authorisation from the member of staff's line manager should be obtained.
- 15 Where hospitality / entertainment is provided to an external contact / organisation other University members of staff may also attend, however the number of external contacts should always be greater than the number of members of staff.
- 16 The purchase of gifts will normally only be appropriate where they are to be presented by the Vice Chancellor or designated deputy when it is anticipated that a gift may be offered, and it is considered necessary to reciprocate or it is culturally appropriate. Occasionally, it may also be appropriate to present a gift to a visiting or overseas VIP. All gifts or hospitality should be paid for using a corporate credit card whenever possible. There is a limit of £50 on gifts purchased using BGU funds.
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