

## **GIFTS AND HOSPITALITY POLICY**

### **1. INTRODUCTION**

#### **1.1. Purpose**

**1.1.1** Members of University staff or University Council may on occasion be offered gifts or hospitality as a gesture of goodwill or gratitude. This policy provides guidance on what action should be taken by colleagues.

**1.1.2** Modest hospitality is an accepted courtesy of any business relationship. However, staff should NOT offer or accept any kind of gift or hospitality which might reasonably be seen or perceived to create a potential conflict and compromise their judgement or influence a business decision. They must not be exchanged in return for any forms of benefits or favours, nor to facilitate a routine business procedure. Members of the University are expected to conduct themselves with due regard to probity and propriety in the course of their employment or engagement with the University, and in their other dealings with the University.

#### **1.2. Scope**

**1.2.1** Under the Bribery Act 2010, it is a criminal offence for employees in an official capacity to accept any gift or consideration as an inducement or reward for:

- doing or not doing anything; or
- showing favour or disfavour to any person.

**1.2.2** The policy applies to everyone working for the University or on its behalf, including agency workers, secondees, interns, consultants and contractors.

**1.2.3** Members of University staff or University Council are required to abide by the highest ethical standards.

**1.2.4** All members and staff must be seen to act with complete honesty and integrity, and must not put themselves in a position where they could be accused of acting improperly. This policy applies to all University activities undertaken in the UK or overseas.

### **1.3. Definition of gifts**

**1.3.1** For the purpose of this Policy, the term “gifts” is deemed to cover:

- goods provided for personal or other private use;
- personal services intended to benefit any recipient directly affiliated to the University;
- loans of equipment, vehicles etc for personal use; and,
- the provision of goods and/or services at preferential cost (including loans of money) for personal or other private use.

### **1.4. Definition of hospitality**

**1.4.1** For the purpose of this Policy, the term “hospitality” is deemed to cover offers of refreshment, invitations to events, travel and/or accommodation by reason of or in connection with University activity or business. This includes hospitality offered to an individual’s family members where there is an actual or potential link to University activity or business

## **2. POLICY ON RECEIVING GIFTS**

### **2.1. Gifts from Suppliers**

**2.1.1** The acceptance of gifts from interested business parties could be presented as promoting a conflict of interest that might arguably have compromised the impartiality of members and staff in the decisions that they were required to make.

**2.1.2** Where staff are receiving hospitality other than gifts of a small intrinsic value, consideration should be given to removing themselves from any procurement process to ensure that there is no perceived conflict of interest.

**2.1.3** Staff should also exclude themselves from the procurement process for any supplier where they have either friends or family in a position of influence as naturally there would be social occasions/dinners, etc where they would meet. This could be considered to be a conflict of interest for Keele staff.

**2.1.4** Offers of gifts and/ or hospitality should be reported to the Chief Financial Officer and should be declined, specifically around key decision milestones (e.g. procurement exercises).

### **2.2. The general principles for the acceptance of gifts are:**

- The gift must be of a nominal or notional value. Typically, a gift should not be accepted if the cumulative value from any one organisation or individual exceeds £200 in any 12 month period or £50 for any one gift.

- The gift must be given for an appropriate reason.
- The gift must be given at an appropriate time (e.g. not in advance of the issuing of an opinion or determination, or in advance of the award of a contract).
- The gift must be of a “one-off” or irregular nature (i.e. that could not be viewed as a regular source of income by HMRC for personal taxation purposes).
- The details of all gifts accepted or declined should be fully recorded in the format below, to include the relevant information and submitted to [finance.purchasing@keele.ac.uk](mailto:finance.purchasing@keele.ac.uk).

**Gifts received:**

Date	Member/ Staff	Gift From	Description	Value	Accepted/ Declined

**Hospitality Received**

Date	Member/ Staff	Invite From	Description	Occasion	Accepted/ Declined

- All Gifts and Hospitality received or accepted will be recorded and maintained in a central register (see Annex A).

- 2.2.1 Do not accept:** Gifts which may look as if they have been offered to compromise personal judgement. These would normally be high value items such as expensive hampers or tickets to premium social events, for example the FA Cup final or Wimbledon final tickets. Gifts in the form of money or vouchers must not be accepted under any circumstance. Any instances of inducements from suppliers must be reported to the Chief Financial Officer via the Head of Procurement and Customer Service.
- 2.2.2 Can be accepted, but should be shared with colleagues on a reasonable basis:** Some gifts and hospitality can be accepted where the value is more reasonable, such as bottles of wine, chocolates, books or T-Shirts.
- 2.2.3 Can be accepted and kept by the individual:** Gifts of a small intrinsic value can be kept by the individual such as pens, diaries, mugs or calendars.
- 2.2.4** Gifts received (whether accepted or declined) should also be recorded in a Hospitality Register using section 2.2 above as a template, held locally by each School or Directorate. The register should contain basic details of the hospitality, the date(s) and the recipients. The register should be available for inspection upon request from the Finance Directorate or any external agency (such as the OfS or the University external / internal auditors).

### **2.3. Gifts from students and their families**

- 2.3.1** The same principles outlined above must be considered if staff are offered gifts from students. Small tokens of appreciation, such as chocolates or wine may be accepted upto the value of £50. Higher value items must be politely refused.
- 2.3.2** It is recommended that staff only to accept these tokens of appreciation once a student has completed their final examinations and the member of staff's professional involvement with them has ceased.
- 2.3.3** In order to avoid misunderstanding or offence, Faculties are encouraged to make the University's policy clear to their students from the outset, and to emphasise that gifts and offers of hospitality to staff are not expected.

## **3 CONFERENCES AND EVENTS**

- 3.1** Staff are sometimes offered free or discounted places at conferences and/or events from current suppliers, prospective suppliers and other commercial organisations.
- 3.2** In the event that a place is accepted by a member of staff at a discounted/free rate, these can be accepted where there is a clear link to University business. However, the member of staff must subsequently ensure that they must declare this when involved in any procurement activities that involve the provider of the discounted rate/free place gaining any advantage.

## **4 POLICY ON RECEIVING HOSPITALITY**

- 4.1** Members and staff should not encourage business contacts to provide hospitality to them, or indirectly to other colleagues, friends or relatives.
- 4.2** Hospitality in the form of reasonable refreshments, such as working lunches or dinners are an accepted part of any business relationship. Excessive hospitality outside of the working context should not be accepted. Any hospitality that is accepted or declined and goes beyond working lunches or dinners should be recorded in the Hospitality Register.
- 4.3** The frequency and scale of any hospitality received should not be significantly greater than the University would provide in return.

## **5 POLICY ON PROVIDING HOSPITALITY**

- 5.1** Meals and refreshments should be provided by the Estate and Campus Services team, unless otherwise agreed for a specific event.
- 5.2** Alcohol will not normally be provided during the course of the working day.
- 5.3** Staff entertaining guests from outside the University at lunchtime are expected to use the University's catering facilities.
- 5.4** Refreshments provided to staff for working lunches are acceptable with the prior agreement of the relevant manager or budget holder.
- 5.5** Refreshments for staff during normal working hours, and not in connection with any formal meeting, are a personal expense and should not be paid for by the University.

## **6 ROLES AND RESPONSIBILITIES**

- 6.1** This policy applies to all members of University staff and lay members of Council in connection with University business.
- 6.2** The Nominations and Governance Committee is responsible for monitoring the policy.
- 6.3** If further clarification is required, then guidance should be sought from the Finance Directorate.
- 6.4** If a member of staff suspects that a colleague is in receipt of excessive or inappropriate hospitality, then this should be reported using the University Whistleblowing Policy.

## **7 RELATED POLICIES AND PROCEDURES**

- 7.1** Anti-Bribery Policy
- 7.2** Whistleblowing Policy
- 7.3** Conflicts of Interest Policy

## **8 REVIEW, APPROVAL & PUBLICATION**

- 8.1** The policy is the responsibility of the Finance Directorate, and will be reviewed in line with the University policy framework every three years.
- 8.2** The Nominations and Governance Committee is responsible for approving the policy.
- 8.3** The policy is in the University Policy Zone.

## 9 DOCUMENT CONTROL INFORMATION

Document Name	Gifts and Hospitality Policy
Owner	Chief Financial Officer
Version Number	V2.0
Equality Analysis Decision and Date	N/A
Approval Date	21/10/2022
Approved By	Nominations & Governance Committee
Date of Commencement	21/05/2019
Date of Last Review	21/05/2022
Date for Next Review	21/10/2025
Related University Policy Documents	See Section 6
For Office Use – Keywords	

## ANNEX A – HOSPITALITY REGISTER TEMPLATE

Date of Event	Recipient	Organisation or Person offering Hospitality / Gift	Details of Proposed Event / Gift	Accepted or Rejected	Authorised Signatory