



GIFTS AND HOSPITALITY POLICY

Status	Approved
Approved by Executive Board	15 November 2011 1 March 2016
Owner	Governance Department
Published	Governance Department Website
Review	Annually
Last Review	20 March 2020

Table of Contents

	Page
1. Introduction	1
2. Purpose	1
3. Scope	2
4. Accepting Gifts and Hospitality	2
4.1. Gifts	2
4.2. Hospitality	3
5. Unacceptable Gifts/Hospitality	4
6. Presenting Gifts and/or Providing Hospitality	4
7. Registration of Gifts and Hospitality	5
Appendix 1: Pro-forma for the Registration of Gifts and Hospitality	6

GIFTS AND HOSPITALITY POLICY AND PROCEDURE

1. Introduction

The University is committed to maintaining the highest standards and conducts its business in accordance with best practice in higher education corporate governance, with the seven principles identified by the Committee on Standards in Public Life: selflessness, integrity, objectivity, accountability, openness, honesty and leadership and in accordance with its obligations under the Bribery Act 2010 .

All staff should conduct themselves with integrity, impartiality and honesty at all times and should maintain high standards of propriety and professionalism. The University does not permit its staff to accept or to offer personal benefits in order to procure services or gain influence. To do so is not only unacceptable, it is also illegal in terms of the Bribery Act 2010 which carries significant penalties.

2. Purpose

The purpose of this policy is to provide guidance to staff, students and governors on the action that should be taken in the event that:

- they are offered gifts and/or hospitality by external organisations;
- or have personal, financial or other beneficial interests in any transaction between the University and a third party;
- or where they are in a position which requires them to offer gifts/hospitality.

This policy is designed to protect staff, students and governors from accusations of bribery and corruption and thereby also protect the reputation of the University.

In the case of third parties acting on the University's behalf, all contracts and agreements make explicit reference to the University's requirement under the Bribery Act 2010 to ensure that no-one associated with it tries to obtain or retain business for the University through bribery. Agents acting on behalf of the University are required to confirm that they will not engage in any corrupt practice, and in particular will not try to influence any person, for the University's benefit by offering money or any other advantage.

This policy is part of a suite of policies and should be read in conjunction with the following:

- Anti-Bribery Policy
<http://www.gcu.ac.uk/gaq/regulationsandpolicies/>
- Financial Procedures: Section 4.2
<https://www.gcu.ac.uk/financeoffice/policiesguidelines/>
- Financial Regulations : Section 2.10
<https://www.gcu.ac.uk/financeoffice/policiesguidelines/>
- Expenses Policy: Section 4
<http://www.gcu.ac.uk/financeoffice/policiesguidelines/>

- Register of Interests Policy
http://www.gcu.ac.uk/media/gcalwebv2/theuniversity/supportservices/peopleservices/Register_of_Interest_Policy_and_Procedure.pdf
- Public Interest Disclosure (Whistleblowing) Policy
http://www.gcu.ac.uk/media/gcalwebv2/theuniversity/supportservices/peopleservices/Public_Interest_Disclosure_Policy.pdf
- Criminal Facilitation of Tax Evasion Statement
<https://www.gcu.ac.uk/financeoffice/criminalfinancesact/>

3. Scope

This policy applies to all University staff, third parties acting on behalf of the University, University governors where they are offered gifts and/ or hospitality in connection with their role as an external member of the Court and students accepting gifts and/or hospitality whilst undertaking business on behalf of the University.

4. Accepting Gifts and Hospitality

4.1 Gifts

Gifts of a nominal value (£50 or less which will be subject to periodic review or a gift of a similar worth outside the UK) from outside individuals or organisations may be accepted. If there is any doubt as to whether the acceptance of such an item is appropriate, staff should decline the gift or refer the matter to their line manager.

- If unsolicited gifts of a value of more than £50 arrive from contractors they should be returned with a polite explanation that the University's policies do not allow their acceptance.
 - There will be exceptional cases where refusal of a gift in excess of £50 would be clearly impractical, discourteous or could cause offence to the donor (e.g. a representative of a foreign government or similar). In such cases staff should consult their line manager, who in turn should discuss the matter with the University Secretary to determine whether the gift should be accepted and in what terms. You should let the donor know that the gift is being accepted on behalf of the University. The University Secretary will report its receipt to the Executive Board; the gift should then be recorded as University property or sold (the proceeds going into general University funds).
 - It is expressly prohibited for a member of staff to accept any gift or benefit from an organisation that is actively involved in a tender process at the University. This prohibition commences at the point that an invitation to tender is published and extends to a period 3 months after a contract has been awarded. Any offers of gifts or benefits during this period must be refused. Where a gift or inducement is offered to the University corporately (rather than to an individual employee) in the course of a purchase negotiation, the representative in the negotiations should refer to the Purchasing Regulations for guidance.
- 2.
- Students are discouraged from making gifts to members of staff. However, if a gift is made staff may only accept this if it is of a token nature.

4.2 Hospitality

It is accepted that, in the course of their normal duties, Court members and staff members will sometimes receive conventional hospitality including, but not limited to:

- Working meals including meals taken in the course of meetings or training schemes.
- Meals provided by other organisations during fact finding or information sharing events.
- Attendance at formal functions as a representative of the University; a formal function is an event promoted by an organisation, usually ceremonial in nature, for which an official invitation is issued to and accepted on behalf of the University.
- Attendance at formal social functions in relation to which invitations have been issued to a number of staff members;
- Attendance at information gathering or sharing events such as meetings with representatives of other universities and organisations for the purposes of sharing good practice.

Members of University Court and staff may accept meals and equivalent hospitality only in the normal course of business and only when the hospitality is appropriate and proportionate. What is reasonable should take into account the nature of the event, and the University representative should ensure the hospitality does not compromise them in any way. In general a meal, moderate associated activity and refreshment would be regarded as acceptable. The frequency and scale of hospitality should not normally be greater than the University would be likely to provide in return.

Particular care should be taken when offered any form of hospitality from a person or organisation which has, or is hoping to have, a contractual relationship with the University. A member of staff should not accept hospitality from an organisation that is actively involved in a tender process at the University, except where this is provided as part of a fact finding visit or meeting. If staff have any doubt about whether to accept any hospitality offered to them they should refer the matter to their line manager, who in turn may discuss it with the University Secretary.

5. Unacceptable Gifts/Hospitality

The types of gift/hospitality below are unacceptable and acceptance of such gifts/hospitality could result in disciplinary action being taken against the member of staff involved:

- Gifts/hospitality which are lavish or expensive, particularly where received on a frequent basis from the same source. Frequent acceptance of meals, tickets and invitations to sporting, cultural or social events.
- Travel or accommodation which does not have a clear business purpose.
- Holidays

- Offers of items or services for personal use at trade or discounted price other than discounts generally available to all or most members of staff.
- Receiving payment or other reward from an external organisation/company for work undertaken in an individual's official capacity as an employee of the University.
- Acceptance of gifts/hospitality which could be deemed as influential in the award of a contract or business to an external organisation – note that the perception of others is critical.
- Inducements that could lead to a contractual position between the University and a supplier, contractor or consultant.
- Acceptance of "gifts in kind" such as professional expertise which would normally incur a fee.
- It is unacceptable to ask for gifts and/or hospitality.

6. Presenting Gifts and/or Providing Hospitality

As part of the University's everyday work, there will be circumstances where it is appropriate to provide gifts or hospitality. Where this is deemed appropriate, prior approval should, wherever possible, be obtained from the relevant line manager.

The University has developed an appropriate range of corporate gifts which can be used for such purposes as marketing, overseas etc.

Appropriate and proportionate costs for entertaining third party business contacts will be reimbursed on production of receipts provided they are reasonable.

The claimant must provide the following information:

- a) the names of all 3rd party guests
- b) the organisation which they represent
- c) the nature of the entertainment
- d) the purpose of the entertainment
- e) the date and place of the event

It is illegal and unacceptable for any member of the University, any governor or any third party acting on the University's behalf to:

- give, promise to give, or offer, a payment, gift or hospitality with the expectation or hope that a business advantage will be received, or to reward a business advantage already given;
- give, promise to give, or offer, a payment, gift or hospitality to a government official, agent or representative to "facilitate" or expedite a routine procedure.

4.

Staff should refer to Section 4 of the University's Expenses Policy for further guidance on the procedure to be followed when offering corporate hospitality

7. Register of Gifts and Hospitality

The University maintains a register in respect of the acceptance of offers of gifts and hospitality which is held in the Governance Department.

Members of Court and staff are required to record all gifts received on the form at appendix 1 within 28 days of receipt and return this to the Governance Department.

Hospitality received under section 4.2 of the policy need not be included in the register. All other hospitality should be recorded.

The register will be open to inspection by the internal and external auditors. It is also important to note that under the Freedom of Information (Scotland) Act 2002, the information contained within the Gifts and Hospitality Register may be disclosed to any member of the public on request.

It is the responsibility of each member of Court and member of staff to ensure that they comply with this Policy and its related procedures.

PRO FORMA FOR THE REGISTRATION OF GIFTS AND HOSPITALITY

Acceptance of all gifts must be formally registered using this pro-forma within 28 days of the date of receipt.

Acceptance of hospitality other than that accepted under section 4.2 of the policy must formally registered using this pro-forma within 28 days of the date of receipt.

Name (block capitals):

School/department:

Date of Receipt of Gift/Hospitality	
Person or Organisation Offering the Gift/Hospitality	
Reason for Gift/Hospitality	
Brief Details of Gift/Hospitality	
Estimated or Actual Value of Gift/Hospitality	

Signed:

Date:

Completed forms should be emailed to court&committees@gcu.ac.uk