

Gift and Hospitality Policy



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| Approved by | Audit Committee | | |
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| Version Number | Purpose/Change | Date |
|----------------|-----------------------------------------|----------------|
| 1 | Creation of Gift and Hospitality Policy | September 2021 |
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GIFT AND HOSPITALITY

1. Policy Overview

- 1.1** In the context of the Bribery Act 2010, it is possible that the giving and receiving of gifts and hospitality may put staff into situations which might fall within the terms of the Act, and therefore lay them open to accusations of bribery.
- 1.2** The Bribery Act does not criminalise genuine hospitality, but government guidance indicates that the more lavish expenditure in relation to travel or accommodation is, the more likely it is to be regarded with suspicion. The acceptance by a member of staff of large gifts or of excessive hospitality, for instance, has both the potential to cause damage to the University's reputation and may additionally lead to criminal prosecution under the Act.
- 1.3** This is particularly the case if gifts and hospitality are received from or given to organisations which have or hope to have a contract with the University;
- 1.4** Having said this, however, the University accepts that there are circumstances, in the course of normal business, where the acceptance of gifts or hospitality is appropriate, or indeed where declining such gifts may cause offence or be detrimental to the University's interests.
- 1.5** The policy therefore attempts to set a series of principles to ensure that staff and students do not put themselves in a position where their integrity might be called into question or the University's reputation might be damaged.

2. Definitions and Scope

- 2.1** Gifts: A gift is normally a tangible item or other benefit given by the University or one of its staff members or other representatives to another person or organisation or vice-versa. Gifts may range from token gifts of little value to a substantial gift of higher value. Common modest gifts given or received include business and branded stationery, flowers, confectionery, USBs and other promotional items.

- 2.2** Hospitality: Hospitality refers to the entertainment and related arrangements that the University may offer to partners or other third parties. Common hospitality includes lunches, dinners, accommodation or entertainment, and range from token hospitality of little value such as providing food and drink (e.g. a working lunch) to high value activities such as a ticket and entertainment for a sporting event or concert.
- 2.3** This Policy applies to:
- 2.3.1 All staff, governors and ‘associated persons’ including agents, partners, contractors, representatives and any others acting on behalf of the University; and
 - 2.3.2 All University activities undertaken in the UK or overseas.
- 2.4** This Policy does not apply to:
- 2.4.1 Gifts and hospitality which the University offers to its own staff or governors, guidance for which is in the University [Expenses Policy](#); and
 - 2.4.2 Philanthropic gifts and donations offered to, and accepted on behalf of, the University, which are covered by the [Philanthropic Gift Acceptance Policy](#).

3. Policy Statements

- 3.1** The offer, provision or acceptance of gifts and hospitality by University staff or associated persons shall only occur when the purpose is:
- 3.1.1 to promote the values and reputation of the University for academic, professional or charitable purposes; or
 - 3.1.2 to aid the establishment and maintenance of academic, collaborative, professional or business relationships with partners and supporters of the University; or
 - 3.1.3 to provide a small token of thanks to University staff, associates or supporters for their contribution to the work of the University;
- 3.2** and, in every case, when all of the following criteria apply:
- 3.2.1 the purpose is not to influence individual recipients or bodies improperly, nor solely to provide personal entertainment;

- 3.2.2 the gift or hospitality offered is appropriate and the value is reasonable and proportionate to the circumstances; and;
 - 3.2.3 provision is in accord with all applicable University policies, governmental legislation and, to the extent it can be reasonably determined, the rules and policies of the other organization involved in the transaction.
- 3.3** Gifts and hospitality shall always be offered, provided or accepted openly, without any degree of secrecy attached.
- 3.4** University staff and associated persons are expressly prohibited from personally offering or receiving any gifts or hospitality:
 - 3.4.1 of money or of a monetary nature;
 - 3.4.2 to induce an individual or organization improperly to provide particular services or preferential treatment;
 - 3.4.3 in expectation of or to reward an individual or body for not performing their work in a proper or impartial manner; and/or
 - 3.4.4 to any individual or organization responsible for a formal application, tendering or procurement process immediately prior to or during that process.

4. Authorisation and Record Keeping

- 4.1** Gifts and hospitality that are in complete accord with the standards set out above must be authorized for offer or acceptance as follows:
 - 4.1.1 Gifts or hospitality up to £100 total value may be self-approved.
 - 4.1.2 Gifts or hospitality above £100 must be pre-approved by the relevant Head of School or Department. Where the transaction is associated with a Head then the normal rules of upward delegation apply. The Chair of the Board shall approve such transactions for the Principal and Vice-Chancellor.
 - 4.1.3 Note – when applied to situations outside the UK these value thresholds should be considered in terms of equivalent sterling value.

- 4.2** The University will maintain a Register of Gifts and Hospitality on which gifts and hospitality received and given should be recorded. The Register is to be maintained by the Director of Finance and is a tool to promote transparency in gifts and hospitality transactions.
- 4.3** It serves as an audit trail to protect individuals and the University from allegations of impropriety and may be used for reporting and disclosure purposes, including Freedom of Information requests.
- 4.4** Gifts and hospitality offered to a member of University staff or to the University which are declined should still be recorded on the Register, as should gifts and hospitality offered on behalf the University which are not accepted.
- 4.5** Gifts and hospitality which do not require approval should still be recorded on the Register, with the exception of token or very low value gifts, e.g., those estimated at £10 or less, which do not need to be recorded on the Register. Normal courtesies of meetings (e.g. refreshments and working lunches/dinners) and meals/accommodation received as part of training courses/conferences do not need to be recorded on the Register.
- 4.6** The Gifts and Hospitality Register will be reported annually to the Chair of Audit Committee; the Chair may, at his or her discretion, report any matter pertaining to the Register to the Audit Committee itself.

5. Compliance

- 5.1** Compliance of the Gifts and Hospitality Policy is a legal requirement. Non-compliance of this policy by University staff may result in disciplinary actions depending on the severity of the non-compliance and could result in legal proceedings.

6. Review

- 6.1** This policy will be reviewed every three years or as required.



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