

Code of practice for gifts and hospitality

Approved by Finance & Human Resources Committee 11.03.03

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Code of practice for gifts and hospitality

1. General principles

- 1.1 This code of practice is designed to prevent the University and its staff being open to allegations of bribery, corruption and inappropriate working practices. The University recognises that staff will use their best endeavours to perform their duties and responsibilities to the highest standard. The standards that the University asks of its staff are set out in its Staff Charter.
- 1.2 The Code of Practice applies to all staff and covers gifts and hospitality offered to staff by students. All staff should be aware of the University's Code of Practice for receipt of gifts and hospitality.
- 1.3 Staff who deal with external contractors, consultants etc, may find themselves in contact with companies which have different operating standards and working practices, that would not normally be considered acceptable by the University. The receipt of gifts and hospitality may therefore be construed as influential, for example in relation to the award of a contract. A list of the types of gift and hospitality which are unacceptable and should be refused by staff, is given in 'unacceptable gifts/hospitality'. If a member of staff is in any doubt about the suitability of any gift/hospitality, advice should be sought from their line manager in the first instance.
- 1.4 A small number of roles exist within the University which routinely include external engagement. In such roles, external partners and potential funders might be invited to lunch or dinner or invite the member of staff for lunch or dinner. In such circumstances the head/director's advance approval should be sought and only modest expenses should be incurred.

2. Register for receipt of gifts and hospitality

- 2.1 Staff should ensure that gifts and offers of hospitality are treated with caution wherever any suggestion of improper influence could potentially arise. Particular care is required when gifts/hospitality are offered by companies, organisations, consultants and individuals seeking business from the University. In order to protect the integrity of the University and its staff, schools and departments are advised to maintain a register for the receipt of gifts and hospitality, which could include the following:
 - a) Name of member of staff.
 - b) Name of company/consultant/organisation and relationship with the University.
 - c) Details of the gift/hospitality received.
 - d) Date gift/hospitality received.
- 2.2 Gifts of a minor nature and of token value need not be registered, including:

- a) small gift of a promotional or advertising nature, such as calendars, diaries or charts.
- b) A small gift where refusal would cause needless offence.
- c) A working meal that is part of an established event.
- d) Attendance in an official capacity as a University employee at Higher Education related functions, conferences, seminars, etc.

This is not an exhaustive list of acceptable gifts/hospitality; each offer needs to be considered in relation to its own circumstances.

- 2.3 Hospitality provided within the structure of a training course, demonstration, seminar or conference etc. or the provision of similar seasonal hospitality would not need to be recorded in the register.
- 2.4 Substantial gifts, if accepted, should be registered and wherever possible shared amongst other members of staff within their respective work area. If in doubt, it is advisable to record the gift/hospitality on the register.

Examples of such gifts/hospitality which staff should never accept include:

- a) Holidays.
- c) Expensive gifts received on a regular basis from the same source.
- c) Use of company flat or hotel suite.
- d) Offers of items or services for personal use, at trade or discount price, other than discounts offered generally to all or most members of staff or trade union members. This excludes items/services purchased at trade or discount price on behalf of the University.
- e) Receiving payment or other reward from an external company/organisation for work undertaken in an individual's official capacity as an employee of the University.
- f) Acceptance of gifts/hospitality which could be deemed as influential in the award of a contract or business, etc. to an external organisation.
- g) Other gifts and/or hospitality which are disproportionately lavish or expensive.

This is not an exhaustive list of unacceptable types of gift/hospitality.

It is also unacceptable for staff to ask for gifts and / or hospitality.

3. Risks and sanctions

Staff should be aware of the risks of accepting gifts/hospitality which could potentially be viewed as an inducement or reward for showing

favour or disfavour to an individual/organisation, which could be considered to be a disciplinary offence up to the level of gross misconduct.

4. Further advice

If a member of staff is unclear about any of the above provisions, finds themselves in a situation that has not been specified, or is unclear about the acceptability of a gift/offer of hospitality, advice should be sought from their line manager.