LONDON
METROPOLITAN
UNIVERSITY

Gifts and Hospitality Policy

Approved by Finance & Human Resources Committee 11.03.03 Updated March 2007 following consultation with Senior Managers and the trades unions

Reviewed February 2014 and updated to reflect new University Faculty organisation

Reviewed December 2016: terminology updates

January 2019: reviewed by HR; no changes made

January 2021: reviewed by HR; no changes made

January 2023: reviewed by HR; no changes made

April 2025: reviewed by HR; minor updates made

September 2026: Reviewed by the Head of Legal Services and

approved by the VC on the recommendation of the Executive Board.

Policy for gifts and hospitality

1. Purpose

1.1. This Policy establishes the University's requirements for the acceptance, provision, declaration and recording of gifts and hospitality.

1.2. It supports the University's commitment to integrity, transparency and accountability and assists compliance with the Bribery Act 2010, the Nolan Principles of Public Life, the Freedom of Information Act 2000 and the University's governance framework.

2. General principles

2.1. This Policy 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.

2.2. The Policy applies to all staff and covers gifts and hospitality offered to staff by students. All staff should be aware of the University's Policy for receipt of gifts and hospitality.

2.3. A gift is any item, benefit, advantage or service provided without payment or at less than its full market value. Examples include bottles of wine or spirits, hampers, flowers, gift vouchers, tickets to events, discounts not available to the general public, tokens of appreciation and other goods or services provided for personal benefit.

2.4. For the avoidance of doubt, low-value promotional items such as pens, calendars, notebooks and similar corporate merchandise are generally regarded as gifts, although they will not normally require recording unless the declaration threshold is met.

2.5. Hospitality includes meals, refreshments, receptions, social events, sporting events, cultural events, entertainment, accommodation, travel, conference attendance funded by third parties and other benefits provided without charge or at less than market value.

2.6. 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 any doubt about the suitability of any gift/hospitality, advice should be sought from their line manager in the first instance.

2.7. 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.

3. Local Registers for receipt of gifts and hospitality

3.1. 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, , all Schools, Faculties and Professional Services must maintain a Gifts and Hospitality Register.

3.2. Heads of School, Deans and Professional Service Directors are responsible for ensuring that gifts and hospitality are recorded in accordance with this Policy.

3.3. The following information must be recorded in the Gifts and Hospitality Register:

- Name of recipient or provider;
- Position held;
- Organisation providing or receiving the gift or hospitality;
- Description of the gift or hospitality;
- Estimated value;
- Date received or provided;
- Whether accepted, declined, returned or retained by the University;
- Reason for acceptance or provision;
- Any conflict-of-interest considerations; and

3.3.1. • Date declared..

4. Declaration Threshold

4.1. Gifts and hospitality received or provided with an actual or estimated value of £50 or more must be recorded in the relevant Gifts and Hospitality Register.

4.2. Where the exact value is unknown, a reasonable estimate should be recorded.

4.3. Low-value promotional items such as pens, diaries, calendars, notebooks and similar corporate merchandise do not normally require recording unless the reporting threshold is exceeded.

4.4. 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.

4.5. Gifts or hospitality received from, or provided to, the same individual or organisation with a cumulative value exceeding £100 within any rolling twelve-month period must be recorded, even where no individual item exceeds £50.

5. Timing of Declarations

5.1. Gifts and hospitality requiring declaration should be recorded as soon as reasonably practicable and normally within 28 days of receipt or provision.

5.2. Substantial gifts, if accepted, must 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.

6. Unacceptable Gifts

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

- Holidays.
- Expensive gifts received on a regular basis from the same source.
- Use of company flat or hotel suite.
- 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.
- 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.
- Acceptance of gifts/hospitality which could be deemed as influential in the award of a contract or business, etc. to an external organisation.
- Other gifts and/or hospitality which are disproportionately lavish or expensive.

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

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

7. Central Gifts and Hospitality Register

7.1. The University Secretary shall maintain a central Gifts and Hospitality Register on behalf of the University.

7.2. Schools, Faculties and Professional Services shall submit copies of their local registers to Governance Services at least annually.

7.3. The central register shall be maintained for governance, audit, transparency and regulatory compliance purposes.

8. Senior Staff Gifts and Hospitality Register

8.1. The University Secretary shall maintain a central register of gifts and hospitality declared by members of the Executive Board and other designated senior postholders.

8.2. Information from this register may be published or disclosed in accordance with the University's Publication Scheme and obligations under the Freedom of Information Act 2000.

9. Risks and sanctions

9.1. 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.

10. Further advice

10.1. 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.

11. Monitoring

11.1. Governance Services shall undertake an annual review of gifts and hospitality declarations.

11.2. A summary report shall be presented annually to the Audit Committee. The report should include:

- The number of declarations made;
- Any significant gifts or hospitality received or provided;
- Any material compliance concerns; and
- Any recommendations for improvement.

11.3. This Policy will be reviewed every three years, or earlier where required by changes in legislation, regulation or University governance arrangements.