

## **Policy on the Acceptance of Gifts, Gratuities and Hospitality**

### 1. Introduction

The University is committed to the highest level of corporate governance and ethical standards in relation to the stewardship of the public and private funds for which it is responsible.

In this context, this policy provides guidance to staff and to external lay members of Senate/University Committees on the circumstances in which it is, and is not, appropriate to accept gifts, gratuities and hospitality. It is also designed to provide protection, both for these individuals and for the University, on those occasions when a gift or hospitality has been accepted, by recording these and the reasons for their acceptance, in an accountable, objective and transparent way.

This policy should be read in conjunction with the following University policies and procedures:

- Code of Conduct;
- Register of Interests Policy;
- Bribery Act 2010 Policy;
- Anti-Fraud Policy;
- Policy for the Acceptance/Refusal of Gifts, Endowments and Legacies;
- Guidance Policy on Staff Relationships;
- Grievance and Discipline Procedures;
- Financial Procedures Manual.

The Bribery Act 2010 Policy is of particular relevance - further information is available [here](#).

### 2. Policy Objectives and Guiding Principles

This policy is underpinned by the following guiding principles:

- (i) All staff and members of Senate/University Committees should adhere, at all times, to the Seven Principles of Public Life, set out by the Nolan Committee - these are selflessness; integrity; objectivity; accountability; openness; honesty; and leadership;
- (ii) The conduct of individuals should not create suspicion of any conflict between their professional duty and their private interest;
- (iii) The action of individuals acting in an official capacity should not give the impression (to any member of the public, to any organisation with whom they deal, or to their colleagues) that they have been (or may have been) influenced by a benefit to show favour or disfavour to any person or organisation;

- (iv) The reputation of the University will be at risk if an unethical relationship is fostered with an individual, business or an organisation.

In this respect, it is an offence for anyone within the scope of this policy to accept any benefit as an inducement or reward:

- For taking any action (or specifically not taking action) in their official capacity.
- For showing favour (or disfavour) to anyone/any business or organisation in their official capacity.

### 3. Scope of the Policy

This policy applies to:

- All individuals working at all levels and grades, including senior managers, officers, directors, employees (whether permanent, fixed-term, extended workforce or temporary), consultants, trainees, seconded staff, and agency staff, sponsors, or any other person associated with the University, wherever located.
- Members of Senate and external lay members of University Committees in relation to their activities as members of such bodies.

### 4. Definitions

The term 'gift' or 'gratuity' includes any personal, material or financial advantage or reward. It also includes discounts.

'Hospitality' includes meals and drinks, invitations to events, accommodation, or travel.

### 5. Considerations

#### 5.1 General Considerations

Before a gift, gratuity or hospitality is accepted, consideration should be given to whether this:

- Is likely to help business effectiveness and foster strategic relationships;
- Would create any obligation, or perceived obligation, on the part of the recipient;
- Could be considered frequent, lavish or prolonged;
- Is connected with any decision affecting the University or the individual offering it;
- Relates to the acceptance of any gift from a person or organisation which has, or is hoping to have, a contract with the University;

- Could be justified to the Head of School/Director and to the public at large/media;
- Provides a benefit to the University which outweighs the risk of possible misinterpretation of the offer of the gift or hospitality.

If on consideration of these factors, acceptance of the gift, gratuity or hospitality seems inappropriate, then the offer should be declined.

## 5.2 Supplier Conflicts

If an inappropriate approach is made to any member of staff by a supplier or potential supplier, this should be reported to the Head of School/Director, in the first instance. Should such an approach be made to a member of Senate/University Committee, this should be reported directly to the Registrar and Chief Operating Officer.

## 6. Gifts and Gratuities - General Guidelines

### 6.1 Acceptance of Gifts and Gratuities

'Token' or seasonal gifts with a value of less than £50, may be accepted, without the need to seek approval - such gifts might include diaries, pens, calendars, paperweights displaying the company logo etc.

Gifts or gratuities, valued in excess of £50, should be considered in line with the approval mechanisms detailed in Sections 8 and 9 below.

### 6.2 Refusal of Gifts and Gratuities

Gifts or Gratuities, valued in excess of £50, should not be accepted in the following circumstances:

- (i) As an inducement either for doing something, or not doing something, in an official capacity;
- (ii) If acceptance results solely in personal benefit, i.e. there is no benefit to the institution in terms of business effectiveness and fostering of strategic relationships;
- (iii) If there is any possibility of an ulterior or dishonest motive on the part of the donor;
- (iv) Where the gift is in the form of a discount card, gift voucher and/or cheque.

## 7. Hospitality - General Guidelines

### 7.1 Acceptance of Hospitality

Hospitality may be accepted in the following circumstances:

- When a member of staff is in the process of building a key strategic relationship with the provider of the hospitality;
- Where a working lunch/dinner of modest standard is offered, in the course of visits or meetings, to enable parties to discuss business relating to the strategic aims of the University;
- If the offer relates to attendance at a social or sporting event where it is considered appropriate for the University to be represented;
- Where participation is undertaken in an official capacity, e.g. speaking at a conference on behalf of the University.

### 7.2 Refusal of Hospitality

Hospitality should not be accepted in the following circumstances:

- Offers of free accommodation, holidays, travel, weekend breaks, free invitations to sporting occasions and entertainment, where there is no organisational benefit. Particular care should be taken when an offer is from an organisation that supplies, or has the potential to supply, goods or services to the University;
- Inducements which could lead to a contractual position between the University and the supplier, contractor or consultant.

On occasions, suppliers will issue invites to attend sporting, social and cultural events. The University does not wish to impose a blanket restriction on the acceptance of such hospitality. Staff and members of Senate/University Committees are, however, advised that they need to be mindful of the cumulative effect of accepting multiple hospitality invitations from the same supplier over a short timescale.

## 8. Reporting/Approval Arrangements - Members of Staff

The reporting arrangements for different categories of gift/hospitality are set out below:

- (i) Gift/Hospitality valued at less than £50: 'Token' or seasonal gifts/hospitality with a value of less than £50 may be accepted, without the need to inform the Line Manager/Head of School/Director. It is not necessary to report or record the acceptance of token gifts/hospitality in the online Gifts and Hospitality Register.
- (ii) Gift/Hospitality valued between £50 and £100: Approval from Line Management should be sought/received prior to accepting any gift/hospitality valued between £50 and £100.

- (iii) Gift/Hospitality valued in excess of £100: In relation to gifts/hospitality valued in excess of £100, it is the responsibility of individual members of staff to seek, prior to acceptance, approval from their Head of School/Director. Where gifts/hospitality, valued in excess of £100, are offered to members of the Senior Management Group, these staff should notify and seek the requisite approvals, prior to acceptance, from their Line Manager.
- (iv) A Gifts and Hospitality declaration should be completed, through Queen's Online, to support the requisite approval process. The declaration must still be completed where an individual chooses not to accept the proposed gift/hospitality.
- (v) In approving gifts/hospitality, the Line Manager/Head of School/Director should take account of the cumulative value of gifts/hospitality received by an individual, from a given organisation, in any one rolling year period.
- (vi) In exceptional circumstances, where gifts/hospitality have been offered during the course of an institutional visit abroad, this should be reported/authorised within 10 working days of the individual's return to the University.

If authorising staff have any doubts about whether an offer of a gift or hospitality should be accepted/not accepted (it is accepted that refusal may sometimes cause offence), they should consult their Head of School/Director in the first instance. In any cases where the Head of School/Director is unsure as to whether a gift or hospitality should be accepted/not accepted, the matter should be referred to the Registrar and Chief Operating Officer who will be the final arbiter on the advisability of accepting gifts/hospitality.

#### 9. Reporting/Approval Arrangements - Members of Senate/University Committees

It is the responsibility of individual members of Senate/University Committees to notify, discuss and seek approval from the Secretary to Senate (Registrar and Chief Operating Officer) prior to accepting any gift or hospitality, valued in excess of £50, which relate to their University role. Full details on the gift/hospitality, together with the related discussions/decision, will be recorded on the Gifts and Hospitality Register retained in the Registrar's Office. The Registrar and Chief Operating Officer will be the final arbiter on the advisability of accepting any such gifts/ hospitality.

#### 10. Further Information

Further information on this policy is available from the Register's Office by contacting 028 9097 2505.

Revised: April 2020  
Approved by Audit Committee: 21 May 2020