

# **Gifts and Hospitality Policy and Procedure**

## **1. Introduction**

- 1.1. The University recognises that the offer and acceptance of gifts and hospitality can make a contribution to our stakeholder relationships.
- 1.2. The gifts and hospitality we give and receive must not compromise our organisation, or our own personal and professional integrity. You have a personal responsibility to ensure this. A policy cannot cover all circumstances and applying this policy relies on your common sense and your personal and professional integrity.
- 1.3. Whilst the University expects its employees, staff and others in scope to comply with this policy, it does not confer contractual rights or form part of any contract of employment and may be amended by the University or replaced at any time following appropriate consultation and negotiation with recognised trade unions.

## **2. Who does this policy apply to?**

- 2.1. This is a corporate policy and applies to all employees (and workers, as applicable), governors, officers, and external committee members of The University of Northampton.
- 2.2. This policy applies to the directors of wholly-owned subsidiary companies unless the company has established an alternative policy. Where this policy applies to a wholly-owned subsidiary, references to the University are to be read as references to the company.

### **3. What does this policy apply to?**

- 3.1. Gifts – Gifts can be tangible, physical items or they can be benefits.  
Examples of benefits are free/discounted use of a facility, a membership, a discount, provision of goods or services at a reduced price, or the option to buy at a favourable price
- 3.2. Hospitality - Food, drinks, meals in restaurants, entertainment for example music, theatre, sport and cultural events, drinks receptions, accommodation and travel
- 3.3. Some types of gifts and hospitality do not fall under this policy. See the section on 'What is not in scope of this policy?'

### **4. Policy on acceptance of gifts and hospitality**

#### **What can I accept?**

- 4.1. You can only accept gifts and hospitality where:
  - 4.1.1. The offer is made for a proper purpose associated with University business
  - 4.1.2. Acceptance is consistent with the University's values and behaviours
  - 4.1.3. The value of the offer and the frequency with which it is made are reasonable and proportionate to the circumstances
  - 4.1.4. Acceptance accords with all applicable University policies, including but not limited to the Code of Conduct and Anti-Bribery, Fraud and Corruption policy
  - 4.1.5. The offer is open and transparent, there is no secrecy involved

4.1.6. Acceptance is within the thresholds set out in this policy. You must seek the approval of your line manager where this policy indicates that it is necessary

4.1.7. Before accepting, ask yourself:

- Would I be embarrassed if anyone found out?
- How would I feel if I read about it in the paper?
- Does receiving it influence me in any way?

If in doubt, refuse the offer

### **What can't I accept?**

4.2. You must never accept gifts or hospitality where:

4.2.1. Acceptance creates an actual or perceived conflict of interest

4.2.2. Acceptance places the University or you under a specific or general obligation

4.2.3. The offer is designed to persuade or induce you to take an action or decision. The offer could be perceived as trying to persuade or induce you to take an action or decision

4.2.4. A decision is about to be made about the offeror

4.2.5. You are prohibited from accepting gifts or hospitality from a person or organisation which is actively involved in a procurement process with the University, except where very modest hospitality (i.e. tea, coffee, biscuits) is provided as part of a fact-finding visit or meeting

4.2.6. You are prohibited from accepting gifts or hospitality from students whose assessment you have not yet marked, or from applicants to academic courses or positions at the University

4.2.7. You are offered cash. Its source is not traceable, and this could be money-laundering

4.2.8. The offer is made to you secretly

4.2.9. Acceptance could jeopardise the reputation of the University

### **What can I normally accept?**

4.3. You can normally accept:

- 4.3.1. Food or drinks in the workplace from an external person or organisation over the course of a business event, or because a business event runs over a mealtime. An external person means someone not in the scope of this policy. A business event means a work-related meeting, conference, lecture, seminar or similar educational event. The hospitality offered should be reasonable and proportionate to the event. This type of hospitality does not need to be recorded on the register unless it seems unreasonable/disproportionate to the circumstances
- 4.3.2. Small gifts such as a box of chocolates or bunch of flowers, promotional items, mugs, diaries, provided acceptance is in line with this policy

### **Approval thresholds**

4.4. You can only accept gifts and hospitality in line with the following approval thresholds

4.5. The thresholds apply to:

- Value of gift or hospitality given to an individual
- Value per person of a gift or hospitality given to a team

4.6. Estimated value: **Up to £50 / Up to £50 per person in a team**

- Who approves your acceptance?
  - You can decide, taking this policy into account
- Does this need to be recorded on the Gifts and Hospitality Register? No
  - If it's a gift, what can I do with it? You can keep it for your personal use or consider sharing with colleagues.

- If you don't accept, you still need to register the offer.

#### 4.7. Estimated value: **Over £50 / Over £50 per person in a team**

- Who approves your acceptance?
  - Your line manager
- Does this need to be recorded on the Gifts and Hospitality Register?
  - Yes. If you accept, include an explanation of why accepting the offer is reasonable, and attach line manager approval. If you don't accept, you still need to register the offer
- If it's a gift, what can I do with it?
  - You can accept the gift on behalf of the University. It becomes property of the University. You should hand it to your line manager as soon as possible

#### 4.8. **Cumulative value received from one person or organisation exceeds £200 in any 12-month period**

You cannot accept gifts or hospitality above this level, whether the gifts or hospitality are given to an individual or to a team.

## **5. Policy on offer of gifts and hospitality**

### **What can I offer?**

- 5.1. You can only accept gifts and hospitality where:
  - 5.1.1. The offer is made for a proper purpose associated with University business
  - 5.1.2. The offer is consistent with the University's values and behaviours
  - 5.1.3. The value and the frequency with which the offer is made are reasonable, moderate and proportionate to the circumstances

- 5.1.4. The offer accords with all applicable University policies, including but not limited to the Code of Conduct and Anti-Bribery, Fraud and Corruption policy
- 5.1.5. The offer is open and transparent, there is no secrecy involved
- 5.1.6. The offer is within budget and has the approval of the relevant budget manager

### **What can't I offer?**

- 5.2. You must never accept gifts and hospitality where:
  - 5.2.1. The offer or its acceptance constitutes an actual or perceived conflict of interest
  - 5.2.2. The offer is made with the intention of placing a person or organisation under a specific or general obligation
  - 5.2.3. The offer is designed to persuade or induce a person or organisation to take an action or decision. Or the offer could be perceived as trying to persuade or induce someone to take an action or decision
  - 5.2.4. A decision about a University matter is about to be made by the person/organisation to which you are making the offer
  - 5.2.5. You are prohibited from offering gifts or hospitality to a person or organisation which is actively involved in a procurement process with the University, except for the provision of very modest hospitality (i.e. tea, coffee and biscuits) as part of a fact-finding visit or meeting
  - 5.2.6. The offer is cash
  - 5.2.7. The offer is made in secret
  - 5.2.8. The offer jeopardises the reputation of the University

## **You can normally offer**

- 5.3. You can normally offer food or drinks in the workplace to an external person or organisation over the course of a business event, or because a business event runs over a mealtime. An external person means someone not in the scope of this policy. A business event means a work-related meeting, conference, lecture, seminar or similar educational event. The hospitality offered should be reasonable and proportionate to the event.

## **You can sometimes offer**

- 5.4. You can sometimes offer the following
- 5.5. A gift. The University does not routinely offer corporate gifts. However, the giving of a gift may be justified in some circumstances for example where failure to do so would cause offence
- 5.6. Other moderate and reasonable hospitality for external persons in the course of a normal business relationship, in accordance with this policy and the Travel and Expenses Policy

## **Approval thresholds**

- 5.7. You can only offer gifts and hospitality in line with the following approval thresholds
- 5.8. The thresholds apply to:
- Value of gift or hospitality offered to an individual
  - Value per person of a gift or hospitality offered to a team
- 5.9. Value: **Up to £50 / Up to £50 per person in a team**
- Who approves the offer?
    - The budget manager, taking this policy into account
  - Does this need to be recorded on the Gifts and Hospitality Register?
    - No

#### 5.10. Value: **Over £50 / Over £50 per person in a team**

- Who approves the offer?
  - The budget manager and your line manager (if the two are different), taking this policy into account
- Does this need to be recorded on the Gifts and Hospitality Register?
  - Yes. Include an explanation of the reason for the offer, and attach line manager approval

## **6. Registration**

- 6.1. The University keeps a register of gifts and hospitality offered, accepted and declined. The register is referred annually to the University Leadership Team and the Audit and Risk Committee
- 6.2. It is your personal responsibility to ensure you have registered gifts and hospitality in scope of this policy
- 6.3. You must register when you have declined offers of gifts and hospitality with a value over £50. This allows the University to monitor any pressure staff are put under, and identify any patterns of offers which might be suspicious
- 6.4. You must update the register as soon as you are able
- 6.5. All members of the University Leadership Team must make a declaration at least annually of the gifts and hospitality they have offered, accepted and declined
- 6.6. You can add items to the register [at this link](#). If you are unable to use an online form, please email [governance@northampton.ac.uk](mailto:governance@northampton.ac.uk)

## **7. What is not in scope of this policy?**

- 7.1. This policy does not apply to the following



- 7.2. Hospitality the University offers to students - see the University's Travel and Expenses Policy
- 7.3. Hospitality offered at internal events for staff, students, governors and others in scope. Consult the University's Travel and Expenses Policy about staff events
- 7.4. University merchandise made available to prospective students at Open Days and other events
- 7.5. Expenses for external examiners and assessors, staff expenses, donations made to the University. Separate policies apply to each of these
- 7.6. Hospitality at an external business event the University has paid for you to attend, for example a conference or development event at another university, provided the hospitality is not disproportionate to the circumstances
- 7.7. Personal gifts and hospitality between colleagues or others in scope which are not linked to University activity (for example giving a personal birthday or Christmas present to someone you work with, entertaining them at your house)
- 7.8. Corporate gifts to staff, including birthday, maternity or leaving gifts. These are not permitted under the Travel and Expenses Policy except in cases of severe illness or bereavement

## **8. I need guidance about how to apply this policy**

- 8.1. You will find frequently asked questions at the end of this document. If you need more help, please speak to your line manager or the Clerk to the Board of Governors.

## **9. Raising concerns**

- 9.1. If you are concerned that someone may have accepted or offered something that contravenes this policy, you are encouraged to speak up.

Concerns should be raised with the person's line manager in the first instance. Where concerns are not addressed, the University's Whistleblowing Policy and Procedure has guidance on what to do.

## **10. Breaches of this policy**

- 10.1. Breaches of this policy may be addressed through the University's Disciplinary Policy and Procedure, or the Board of Governors' Disciplinary Policy and Procedure in the case of Board members.

## **11. Record keeping and retention**

- 11.1. The Register of Gifts and Hospitality is maintained by the Clerk to the Board of Governors
- 11.2. Retention trigger: Date of entry on the register  
Retain for: 10 years  
Action: Destroy  
Responsible: Clerk to the Board of Governors

## **12. Ownership**

- 12.1. The Clerk to the Board of Governors owns and manages this policy on behalf of The University of Northampton.

## **13. Associated documents**

- 13.1. Financial Regulations
- 13.2. Code of Conduct for Staff
- 13.3. Board of Governors' Code of Conduct
- 13.4. Anti-Fraud, Bribery and Corruption Policy and Procedure
- 13.5. Acceptance of Donations and Donor Relations Policy and Procedure
- 13.6. Whistleblowing Policy and Procedure
- 13.7. Travel and Expenses Policy

### 13.8. Declarations of Interest Policy and Procedure

## **14. Equality impact assessment**

An equality impact assessment has been completed for this policy.

## **15. Approval and review**

### 15.1. Approving bodies

Trade Union Liaison: 14.03.2023

University Leadership Team: 21.03.2023

### 15.2. Review schedule

Review frequency: Every 3 years

Date of next review: March 2026

### 15.3. Version control

v1.6 January 2018

v2.0 March 2023 - Re-written. Changed approval thresholds. Added policy on offering

## **16. Frequently asked questions**

### **I'm not sure of the value of what I'm accepting, what should I do?**

If you're not sure of the value, but it seems like it could be over £50, take the cautious route and treat it as though it is worth over £50.

### **What if there's no time to get my line manager's approval?**

You may find that the offer of a gift, or hospitality like an invitation to a restaurant puts you on the spot. Ask yourself:

- Would my approach embarrass me or the University? How would my approach look if published in a newspaper or online?

- Does it look odd or seem disproportionate in the circumstances?
- Am I comfortable with the example this sets for future decisions?

If you're comfortable with your answers to these questions, you can accept. If it's over £50, add it to the register as soon as you can and report it to your line manager. If it's a gift with a value over £50, make clear that you are accepting it on behalf of the University, and hand it to your line manager as soon as possible.

**The University has paid for me to attend a conference or event, and hospitality is on offer. Can I accept?**

Yes. However, if the hospitality seems disproportionate or particularly lavish, record it on the register on your return.

**How can I refuse a gift, especially if refusal may offend?**

This is a common dilemma for the University's staff, especially where gifts from students are concerned. If you have not yet marked their work, you must never accept. In other circumstances you can accept small gifts, like a box of chocolates or some flowers, up to the value of £50. In some cases, you may feel pressure to accept higher value items (over £50) and will need to use your judgement. A polite refusal by referring to this policy may well be understood. A genuine offeror should see that a gift is not a friendly gesture if it could compromise your professional integrity. If you feel obliged to accept a higher value item, make clear that you are accepting on behalf of the University. You must report acceptance to your line manager and record it on the register as soon as possible.

**Someone I work with gave me a Christmas present. Was it OK to accept?**

Yes. If your colleague intended to give you a personal gift rather than a gift on behalf of the University, that's fine. You should both be comfortable that none of the circumstances in which you cannot accept apply. You don't need to record colleague-to-colleague gifts on the register.

**I want to take a business contact out to a restaurant**

You can offer this if it's reasonable and proportionate to the business relationship, and to the seniority and status of the people entertained. You will need the approval of the budget manager and your line manager.

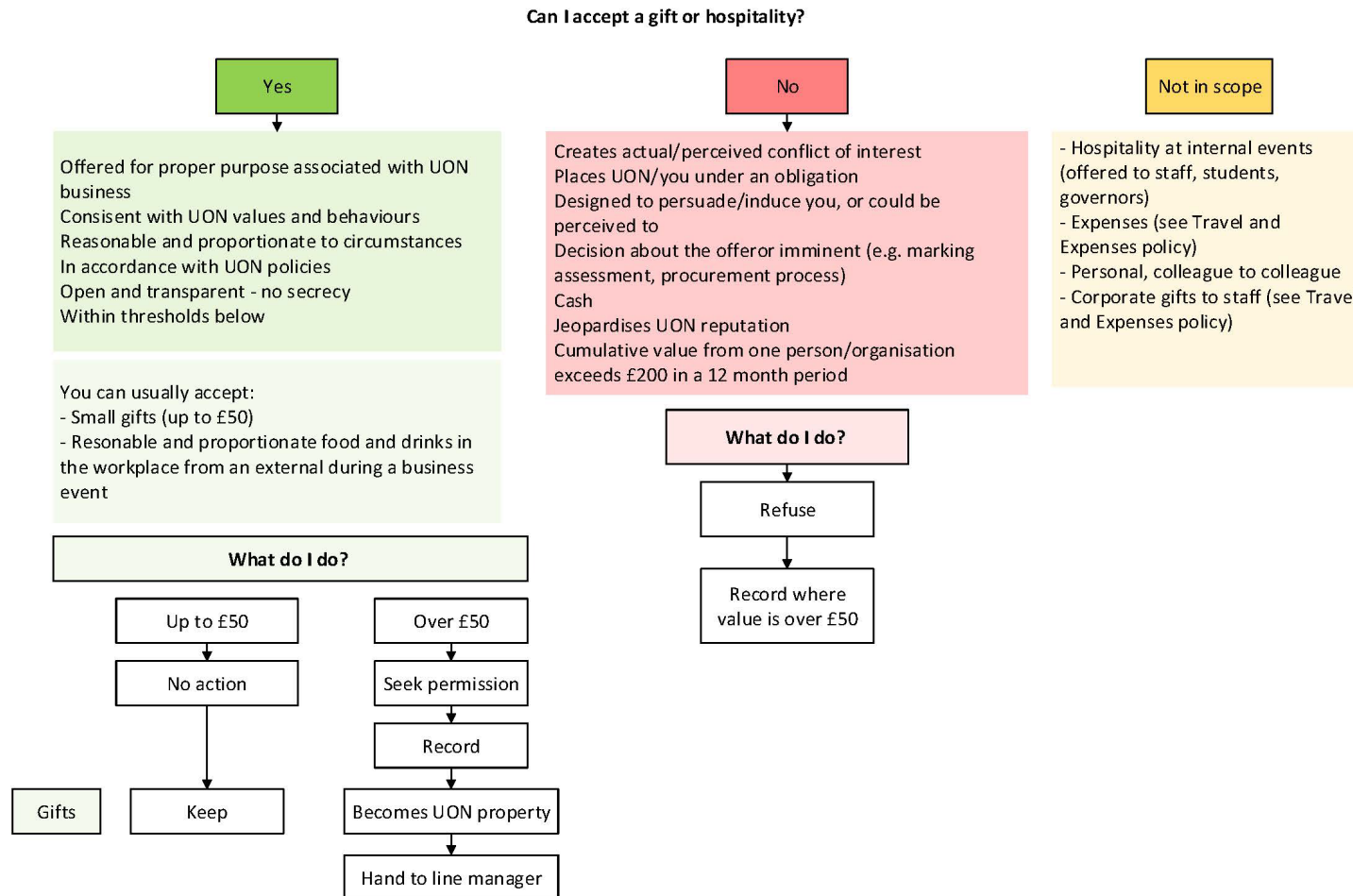
**Someone I line manage has handed me a gift which was worth over £50 and is now the property of the University. What should I do with it?**

The options for disposal of gifts worth over £50 are:

- Give to an organisation as a charitable donation
- Consult the Marketing Department about whether they could offer the gift as a prize
- Display in the University
- Divide equally amongst colleagues

If in doubt, consult your own line manager. The ultimate authority for decisions about the disposal of gifts is a member of the University Leadership Team. If none of the above options are possible, a member of the University Leadership Team can sanction a member of staff keeping a gift worth over £50 for their personal use.

## 17. Quick guides



## Can I offer a gift or hospitality?

