

SGUL Gifts and Hospitality Policy

Updated June 2023

Gifts and Hospitality Policy

A. Introduction

SGUL is an organisation funded by public money from the Government and its agencies, e.g. OfS, by research grants and contracts from a number of sources, such as the Research Councils, UK Charities and Industry and the European Union, as well as tuition fees and donations.

This policy applies to all levels of SGUL staff, part time or full time, including contractors and agency staff working for SGUL, irrespective of country of employment and applies to activity anywhere in the world. Suppliers acting on SGUL's behalf must also adhere to this policy as should applicants, potential applicants and agents acting on their behalf. The term staff or employee used in this policy will include these non-staff categories.

SGUL staff must at all times act in a fair manner, without favouritism and bias.

SGUL needs to be accountable for the funds it receives and report its spending accurately and transparently. This policy provides guidance to SGUL staff with regard to when it is and is not acceptable to accept gifts or hospitality from external parties.

Gifts and hospitality received by staff are a form of income and should therefore be reported accurately. Records should also be kept for audit purposes and could be called upon should SGUL receive a Freedom of Information (FOI) request.

It is the responsibility of every member of staff to ensure that they comply with this policy. Any failure to comply with the terms of this policy could result in disciplinary action.

This policy includes gifts and/or hospitality offered to staff and/or their spouse/partner or members of their close family or work group. References below to staff should be taken to include their spouse/partner or members of their close family or work group.

The following University policies and procedures should be referred to in conjunction with this policy:

- Anti-Corruption Policy.
- Dignity at Work Policy
- Code of Conduct on Personal Relationships
- Anti-Fraud Policy
- Disciplinary Code and Procedure in Respect of Students

Please note that the Anti-Corruption Policy takes precedence over the SGUL Gifts and Hospitality policy in the event of any inconsistency or uncertainty.

Pursuant to the Bribery Act 2010, SGUL and/or its staff may be rendered liable to prosecution if there is evidence pertaining to the receiving or offering of bribes or inducements.

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B. Definitions

For the purposes of the present policy external parties shall include but not be limited to:

- Suppliers or their agents
- Potential suppliers involved in a tendering process
- Investors
- Students, their relatives or friends
- Customers
- Other Universities and partner organisations

Gifts shall be understood to mean:

- Any personal, material and/or financial advantage or reward.

Hospitality shall be understood to mean:

- An offer of food, drink, invitations to events, travel and/or accommodation.

C. Examples

Examples of gifts and hospitality include, but are not limited to:

- Bottle of wine or any kind of alcohol
- Box of chocolates
- Hamper
- Invitation to dinner at a restaurant
- Art work
- Electrical equipment
- Cash or cash equivalent (such as gift certificates or vouchers)
- Tickets to a show
- Invitation to a sporting event
- Round of golf
- Offer of use of a holiday home
- Offer to have accommodation and/or travel paid for by an external party
- Suppliers paying for a site visit

D. General Principles

1. A University employee or any member of their family or work group should not, directly or through others, solicit or accept money, gifts, hospitality or anything else that could influence or reasonably give the appearance of influencing any University decision related to an external party.
2. Only small gifts and hospitality which are of an appropriate type and value, taking into account the reason for the gift or hospitality, may be accepted.
3. Only gifts and hospitality which are given openly and not secretly can be accepted.
4. Gifts or hospitality cannot be accepted where the recipient knows or suspects that they are offered or provided with an expectation that a business advantage would be provided in return, or in explicit or implicit exchange for favours or benefits.

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5. Gifts, including cash, or hospitality must not be accepted, irrespective of value, in circumstances where they might influence or be seen to influence such situations as the outcome of an exam, the acceptance of a student into the University, the quality of a reference, or any other decision regarding a student's progress or career.
6. Unless staff have been informed otherwise, they may accept a gift of less than £10 from a student or related external party when it is customarily offered to others having a similar relationship with that student. There may be occasions when students or their relations make token gifts to staff, such as a box of chocolates of low intrinsic value, in appreciation of the support received during their studies. Staff may accept such gifts but are advised to declare them to their line manager. Any gift from a student should only be accepted once that student has graduated and all decisions relating to their progress or career are completed.
7. It is not permitted for staff to accept any gifts or hospitality going beyond refreshment appropriate to the circumstances from an organisation that is actively involved in a tender process at SGUL. The period for which this is not permitted commences from the time at which an invitation to tender is published and extends to a period 3 months after a contract has been awarded.
8. It is not permitted for staff to accept any gifts or hospitality going beyond refreshment appropriate to the circumstances from parties aiming to become potential suppliers, their agents or investors.
9. Staff with responsibility for the purchase of supplies must be particularly careful that there can be no criticism that preferential treatment has been given to potential suppliers by accepting gifts or hospitality.
10. It is not permitted to accept any cash or cash equivalent (such as gift certificates or vouchers). This is as set out in the Anti-Bribery Policy
11. Gifts cannot be accepted from government officials or representatives, or politicians or political parties, without the approval of the Compliance Manager, please see the Anti-Bribery Policy.
12. If another University or organisation offers a SGUL staff member gifts or hospitality by virtue of their position at SGUL it is not permitted for them to accept anything going beyond refreshment or small tokens given to all parties (pens, notebooks).
13. If staff need advice as to what is appropriate to the circumstances they should seek guidance from their line manager.
14. No external party should ever feel that they are expected to give any gift or hospitality to a member of staff.
15. If excessive gifts or hospitality are offered, or if any gift or hospitality is offered at a time when it could be perceived as potentially influencing decision-making or misinterpreted by others then the gift or hospitality should be politely declined or returned to the giver.
16. No external party should be unnecessarily offended by a member of staff refusing to accept a gift or hospitality. If it is deemed that the refusal of a gift or hospitality is likely to offend the external party staff are advised to inform the external party of SGUL's policy on gifts and hospitality.
17. If staff have concerns with regard to the behaviour of an external party offering a gift or hospitality they should discuss this with the Finance Director or the Academic Registrar in the case of a student.

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18. Where the value of a gift or hospitality exceeds £50 or the value cannot be determined, staff are required to submit a declaration form within one month of receipt. Where hospitality or gifts totaling £250 are received from the same organisation or individual over a 12 month period, this must also be declared, regardless of the value of the individual items. The declaration should be passed to the Finance Director who will retain it. A link to the declaration form is available below.
19. The Finance Director will be required to provide copies of declarations should they be requested, for example, by parties such as SGUL's auditors or in connection with Freedom of Information requests etc.
20. Gifts or donations, given for the benefit of the SGUL rather than to an individual employee, and given after graduation of the student, after a contract has been signed with a supplier or investor or after a collaborative agreement has been finalised between Universities are acceptable but must be referred to External Communications so that a complete list of all gifts/donations to SGUL can be maintained.

Further Information

If after having read the SGUL Gifts and Hospitality policy you have a query which is not covered in the policy, please contact the Finance Director.