



FINANCIAL PROCEDURES

Section 11 – Acceptance or Provision of Gifts & Hospitality

Approving Body:	Resources and Performance Committee
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Section 11: Gifts & Hospitality Policy

11.1. Introduction

- 11.1.1. This policy sets out the University's expectations of its staff and members of Council and other committees on the giving and receiving of gifts and hospitality. The policy should be read in conjunction with the Aberystwyth University Anti-Bribery Policy and the Bribery Act 2010. In principle, University staff members and officers are not allowed to accept any gifts nor hospitality.

[Aberystwyth University - Finance Department : Financial Regulations, Procedures & Policies](#)
[Bribery Act 2010 guidance - GOV.UK \(www.gov.uk\)](#)

- 11.1.2. Staff should be aware that this is an area where perception is almost always more important than fact. The acceptance of gifts and excessive hospitality can cause damage to the University's reputation and may lead to prosecution under the Bribery Act 2010. This policy seeks to protect staff from the suspicion of dishonesty as well as from the perception that their decision-making may have been influenced as a result of the acceptance or provision of gifts or hospitality. By doing so, the policy aims to ensure staff are free from any conflict of interest.
- 11.1.3 The University is committed to abide by all legislation relevant to the prevention of bribery and corruption in all nation states in which it operates, and is bound by the UK Bribery Act 2010 in respect of its conduct both in the UK and overseas.

11.2. Definitions

- 11.2.1 Gifts are items or services given or received to an individual for which no payment has been made in return or where the item or service has been accepted or provided at a level clearly below an appropriate market value.
- 11.2.2. Hospitality can be defined as any food, drink, accommodation or entertainment which has been provided either without charge or at a heavily discounted rate.

11.3. Principles

- 11.3.1. No staff or members of the University Council or committees must accept, solicit or offer any personal benefit as an inducement or reward for taking specific action or for showing favour or disfavour to any other person or entity. This includes the acceptance or solicitation of benefits on behalf of other related parties, such as partners, spouses, other family members or colleagues.
- 11.3.2. Before accepting small unsolicited gifts or other benefits, staff should determine that acceptance:
- does not place them in a position where their integrity or professionalism may be called into question.
 - bears no direct or perceptible indirect link to any formal procurement process for goods or services.
 - does not create a specific or general obligation which the member of staff or the University is required to fulfil.
 - does not constitute an actual or perceived inducement in respect of a decision that the University must take.
- 11.3.3. These principles notwithstanding, the University accepts that there may be circumstances where the unsolicited acceptance of gifts or hospitality will be appropriate, or indeed where declining such gifts or hospitality may cause offence that is detrimental to the University's interests.
- 11.3.4. The University expects its staff and also the members of the University Council to exercise the upmost care when being offered gifts and hospitality when on University business. In particular, care should be taken when being offered a gift or hospitality from a person who, or organization which, has or hopes to have a contract with the University. Additionally, staff should take special care when being offered gifts or hospitality from a person who, or an organisation which, might be perceived to be seeking to gain academic advantage or influence. This will include, but

is not limited to, such circumstances as acceptance onto a programme of study, assessing a student's work, or the interpretation or provision of favourable research results.

11.3.5. If, having previously accepted a gift a member of staff finds him or herself in a position where a decision might be construed as having been influenced by the acceptance of that gift the resulting conflict of interest must be declared to the Director of Finance and Corporate Services as soon as possible.

11.3.6. The guiding principle is that the gift should be proportionate and appropriate to the circumstances in which it is offered or received. Staff should at all times avoid the risk of accepting or providing gifts which might be perceived as immoderate, excessive or extravagant, whether by members of the University or the public.

11.4. Guidance

General

11.4.1. Before accepting unsolicited gifts or other benefits and irrespective of the guidance given below, staff have a personal responsibility to consider in every case whether acceptance might put them in breach of the principles outlined above. Where this is, or may be perceived to be the case, staff should politely decline.

Receiving Gifts or Hospitality

11.4.2. Staff may accept gifts of low intrinsic value (generally taken to be below £25), such as tokens of gratitude; promotional and corporate gifts bearing the institutional or organisational logo or name of the giver; or books (including e-books) from publishers to academic staff where the books are relevant to the academic and/or professional interests of the staff concerned.

11.4.3. Gifts of greater than low intrinsic value should on the whole be declined or returned. All such gifts, whether declined or accepted, must be reported to the Senior Budget Manager and be entered into a Register of Gifts & Hospitality (see below). Senior Budget Managers must report such gifts to the Director of Finance and Corporate Services.

11.4.4. Advice on whether a gift of greater than low intrinsic value can be accepted should be sought in the first instance from the relevant Senior Budget Manager who should refer the matter to their Accountable Budget Manager if they consider it appropriate to do so.

11.4.5. Gifts of greater than low intrinsic value that are nevertheless accepted should normally be regarded as the property of the University and used or retained accordingly.

11.4.6. In the event of gifts being retained by staff, staff are wholly responsible for any tax implications that may be associated with the receipt of personal gifts or other benefits, including any responsibility for reporting them to HMRC.

11.4.7. Gifts of money (or monetary instruments) to staff should never be accepted regardless of amount. Gifts of money to the University should be received only if they are clearly charitable donations, co-ordinated through the Director of Development and Alumni Relations.

11.5. Providing Gifts or Hospitality

11.5.1. Business gifts, including hospitality, may on occasion be provided by the University. This would normally be acceptable in circumstances where external or international visits take place and gifts are exchanged as a means of cementing goodwill, or as tokens of gratitude.

11.5.2. In this regard, gifts should normally be of a type and value which fall within the guidance set out above for the acceptance of gifts, and especially in accordance with the description given at paragraph 10.4.2.

10.5.3. Hospitality provided to external visitors should likewise fall within the description set out above for the receipt of hospitality.

11.5.4. Where gifts or hospitality are offered that fall outside the definitions and scope of the above principles and guidance, these must be entered into a Register of Gifts.

- 11.5.5. University funds shall not normally be used to purchase gifts or provide benefits in kind to members and former members of staff. In exceptional circumstances, such as retirement after long service, Senior Budget Managers may authorise appropriate levels of expenditure if previously agreed with the Director of Finance and Corporate Services.
- 11.5.6. Goods, services, vouchers, payments, etc. received from suppliers or agents (other than goods officially ordered) shall be declared to Senior Budget Manager who will maintain records. This rule is waived in respect of small items, such as diaries, provided that they have a value not exceeding £25.
- 11.5.7. The Director of Finance and Corporate Services shall maintain a register of notified hospitality and shall require each Head of Department to keep such a register and provide an annual return to the Director of Finance and Corporate Services.
- 11.5.8. Staff are reminded of the need to be mindful of the provisions of the Bribery Act and to take account of the University's policies and procedures relating to this.

11.6. Register of Gifts

- 11.6.1. In the interests of transparency, Senior Budget Managers, Pro Vice Chancellors and the Vice Chancellor must ensure that local Registers of Gifts are kept within their areas of responsibility.
- 11.6.2. Each Register should record the following:
- Description and Nature of gift;
 - Whether the gift was received or provided by a member of the University;
 - Value or estimated value;
 - Name of individual/company providing the gift;
 - Whether the gift was accepted or declined;
 - Date of receipt;
 - Name of individual/company who received the gift, and if a University employee, whether personally or on behalf of the University;
 - The circumstances within which the gift was offered.
- 11.6.3. In the case of members of the University Council, gifts should be recorded by the Clerk to the Council in the Register held by the Vice-Chancellor's Office.
- 11.6.4. Each local register shall be reported annually, or on request, to the Director of Finance and Corporate Services for onward reporting to the University Audit, Risk and Assurance Committee, as appropriate.
- 11.6.5. Failure to declare gifts or failure to include them on a timely basis on the Register of Gifts & Hospitality may constitute misconduct, particularly where acceptance or provision of such gifts calls into question the integrity of the individual receiving or offering such gifts or where as a result the University is brought into disrepute.

Recipient/ Provider	Who to report to
Staff within Departments	Senior Budget Managers Line-Manager or Director of Finance and Corporate Services
Senior Budget Managers	Director of Finance and Corporate Services
Institute Directors, Heads of Departments & Pro Vice Chancellors	Director of Finance and Corporate Services
Independent members of Council	Clerk to the Council
Vice Chancellor	Chair of Council

Section 11: Gifts & Hospitality

Form for Receipt of Offers of Gifts or Hospitality

All Offers (whether accepted or refused) of Gifts or Hospitality	
Hospitality Name of Employee (Recipient)	
Job Title and Department	
Description of Gift/ Hospitality Offered (including Date Received/ Date Offered)	
Name and Address of the External Organisation that has made the Offer	
Relationship to the Company and circumstances under which Offer was made	
Estimated Value	
Accepted/ Declined	
Reason for Acceptance/ Decline	
Employees Signature	
Date of Notification	
Acceptance of Offers of Non Trivial Gifts or Hospitality	
HOD or R&S Comments	
HOD or R&S Signature confirming receipt of Gift/ Hospitality in accordance with Policy	