

GIFTS AND HOSPITALITY POLICY

Rev	Date	Purpose of Issue/Description of Change	Equality Impact Assessment Completed
1.	29 th March, 2012	Review (as an Appendix to the Policy on Corporate Hospitality)	
2.	5 th October 2015	Review and approval by Compliance Task Group (as an Appendix to the Policy on Corporate Hospitality)	1 st December 2015
3.	3 rd June 2019	Review as a new Policy, and approval by Compliance Task Group	
4.	22 nd September 2022	Review and re-approval	

Policy Officer	Senior Responsible Officer	Approved By	Date
Head of Legal Services	University Secretary	Compliance Task Group	22 nd September 2022

This Policy will be reviewed in 3 years

GIFTS AND HOSPITALITY POLICY

1. Introduction

The University acknowledges that during the course of normal business transactions a member of staff may be offered, or may wish to offer, gifts or hospitality. The guiding principle in these procedures is that a member of staff should not be influenced in any decision-making, or in providing advice on decision-making, by the acceptance of these gifts, hospitality or other favours from or to any individual or organisation. The Policy seeks to be clear on what Bangor University expects of its members of staff when they offer or receive gifts or hospitality. These procedures should also be read in conjunction with the University's Anti-bribery Policy.

This Policy applies to all members of staff.

2. Principles and Definitions

Members of staff should adhere to the following principles:-

- a) No personal gift, money, hospitality or favours, or participation in any social or leisure function should be accepted by any member of staff (with the exception of points 2., 3. and 4. below) from any organisation or individual from whom the University purchases services or items, or to whom contracts are let, or in respect of whom a beneficial decision is possible. The same would apply for any organisation or individual where the University has an intention to purchase from, let a contract to or make a beneficial decision about in the future. In general, gifts, hospitality etc. should therefore be politely refused, with an explanation that this is University policy.
- b) A gift which has a low intrinsic value (e.g. calendar, pen, diary etc.) may be accepted so long as the existence of the gift is notified to the Dean of College/Head of School or Director of Professional Service.
- c) An exchange of modest gifts or reciprocal hospitality, (e.g. with a visitor from another university or organisation) which is a gesture of goodwill and where embarrassment might be caused to the University if the gift or hospitality is refused, may be accepted and recorded by following the process outlined in Section 3 below. However, staff members should always attempt to discuss the appropriateness of such an exchange with the relevant Dean of College/Head of School or Director of Professional Service prior to acceptance.
- d) Participation in events or exhibitions etc. which have a commercial orientation and are run by organisations or individuals from whom the University purchases services or items, or to whom contracts are let, or in respect of whom a beneficial decision is possible must be authorised by the Dean of College / Head of School or Director of Professional Service. The same would apply for any organisation or individual where the University has an intention to purchase from, let a contract to or make a beneficial decision about in the future. Such participation should be declared and noted by following the process outlined in Sections 3 and 4 below.
- e) The definition of corporate hospitality is not intended to cover working lunches which are effectively meetings or extensions of meetings or the offer of non-alcoholic drinks or light refreshments; similarly, invitations to dinners organised by professional bodies may be accepted, although staff members should use their discretion as to when it would be appropriate for such invitations to be accepted, having due regard to the requirements of these procedures, the proportionality of the hospitality and the University's Anti-bribery Policy.

3. Approval and Declaration Process: Gifts

a) Gifts intended for personal use from students

The University does not encourage members of staff to accept gifts from students or their families, however it is acknowledged that there may be occasions where a modest gift (e.g. a box of chocolates, a bottle of wine or another gift with a low intrinsic value) may be given in appreciation of the support received. Members of staff may accept such gifts however the gift must be declared to their line manager, who must make a note of the declaration.

b) Gifts intended for personal use from other members of staff

The University does not encourage members of staff to accept gifts from other members of staff, in recognition of business support given (this does not include personal gifts from a member of staff to another e.g. to celebrate a birthday). It is acknowledged, however, that there may be limited occasions where accepting a modest gift (e.g. a box of chocolates, a bottle of wine or another gift of low intrinsic value) may be acceptable. The member of staff receiving the gift should always refuse the gift in the first instance, but if this causes offence the member of staff can accept the gift, however the gift must be declared to their line manager, who must make a note of the declaration.

c) Gifts intended for personal use from external contacts / organisations

Gifts intended for personal use (unless they are of a low intrinsic value e.g. calendar, pen, diary etc.) from external contacts / organisation should be politely refused and the gift returned to the sender, citing this Policy as a reason for the refusal. Cash gifts, gift vouchers or any special discounts, which would not normally be available to members of staff should be refused citing this Policy as a reason for the refusal. If refusing a gift of any type would be likely to be misinterpreted by others, the member of staff should report the nature of the gift refused to their line manager.

d) Gifts intended for the University

There may be occasions where a member of staff receives a gift from an external contact or organisation for Bangor University. In all such cases the member of staff should draw it to the attention of the relevant Dean / Head of School or Director of Professional Services, who should make a decision whether such a gift should be accepted.

4. Approval and Declaration Process: Hospitality / Entertainment

a) Accepting Hospitality / Entertainment

Members of staff can accept reasonable and proportionate business-related hospitality and / or entertainment from external contacts and / or organisations provided the offer is not capable of, or seen to be capable of, influencing business decisions to the detriment of the university. The acceptance of hospitality while a member of staff is in attendance at business related events or functions organised by external contacts / organisations can be accepted where it is clear that the hospitality is of a corporate rather than personal nature.

If a member of staff believes that accepting such hospitality / entertainment is likely to be misconstrued, the offer should be politely refused, citing this Policy as a reason. Members of staff should also not accept regular offers of hospitality / entertainment from the same external contact / organisation as this could be misinterpreted.

Where there is any doubt in a member of staff's mind about accepting hospitality / entertainment the offer should always be refused. If refusing hospitality / entertainment would be likely to be misinterpreted by others, the member of staff should report the nature of the hospitality / entertainment refused to their line manager.

b) Providing Hospitality / Entertainment

Members of staff are able to offer meals, drinks and hospitality for a business-related function to external contacts / organisations as long as the offer of hospitality is appropriate and proportionate to the business being transacted and is not seen, especially by the recipient(s), as being in some way an inducement to influence a business-related decision.

The cost of hospitality should be reasonable, and prior authorisation from member of staff's line manager should be obtained prior to the hospitality / entertainment being booked and offered to an external contact / organisation. Where hospitality / entertainment is offered this should be, where this is possible, within the University campus using University services. If it is necessary to use external facilities to provide the hospitality / entertainment prior authorisation from the member of staff's line manager should be obtained.

Where hospitality / entertainment is provided to an external contact / organisation other University members of staff may also attend, however the number of external contacts should always be greater than the number of members of staff.

5. Further Advice and Guidance

Where a member of staff is in any doubt regarding the acceptance or offering of gifts, hospitality or entertainment they should consult their Dean of College / Head of School or Director of Professional Services for further advice. The Dean of College / Head of School or Director of Professional Service may, in turn, bring the matter to the attention of the Head of Legal Services, who may consult the University Secretary for advice or a final decision.

Members of staff should be aware that any non-compliance with this Policy may result in disciplinary action being undertaken.

6. Record Keeping

The Dean of College / Head of School or Director of Professional Service must ensure that an appropriate register of declarations under this Policy is maintained within their area of responsibility. This register shall be available to the University's Head of Legal Services, the University's Internal and External audit service, the Audit and Risk Committee and any other appropriate members of staff as authorised by the University Secretary.

The register of declarations under this Policy must be maintained on an academic year basis by each College, School or Professional Service and must be kept for a period of five years before being confidentially destroyed.