

GIFTS AND HOSPITALITY PROTOCOL

As set out in our Accountability Code of Practice we value our reputation for transparent conduct and ethical behaviour in all of our activities and take steps to prevent bribery in line with the principles set out in the Bribery Act 2010. It is possible that the giving and receiving of gifts and hospitality may put staff members into situations which might fall within the terms of the Act, and therefore lay them open to accusations of bribery.

It is recognised that members of staff may sometimes be offered gifts or hospitality as a courtesy or a thank you. However, such offers can put staff in a difficult position, as they may feel it would cause offence to refuse the gift but in some cases accepting the gift may be open to misinterpretation. This protocol has been drawn up to make it clear what gifts and hospitality staff should and should not accept and what process they should follow if they do accept a gift.

In cases of doubt, members of staff should consult their Dean of School or Head of Department who may, if necessary, consult the University Secretary, whose decision shall be final.

Members of Court must not receive gifts, hospitality or benefit of any kind from a third party which might be seen to compromise their personal judgement or integrity. Any offer or receipt of such gifts, hospitality or benefits should immediately be reported to the Court Office.

Gifts

Staff may accept gifts of token value. This means gifts of a value of £30 or less. Gifts other than those of token value should normally be refused. If such refusal is deemed likely to cause offence, the gift may be accepted as a gift to the University and should be passed on receipt to the University Secretary.

The University Secretary shall decide whether the recipient may retain the gift, whether the University should retain it, whether it should be disposed of e.g. to charity or, exceptionally, returned to the donor with an explanatory letter.

Gifts of cash should never be accepted, regardless of value. Gifts from suppliers or potential suppliers of goods and services to the University (other than items such as diaries, calendars etc.) should always be declined. Gifts offered to academic staff by current students should always be declined until after final marks have been confirmed as any such gift could be deemed to have an influence on academic judgement.

Hospitality

Hospitality such as meals or refreshments offered in the normal course of business may be accepted. As a guide, the frequency and scale of hospitality that it is appropriate to accept should not be significantly greater than the University would be likely to provide in return. Hospitality that might be regarded by a reasonable person as excessive in the circumstances or as a possible inducement should be politely declined.

Register of Gifts and Hospitality

Staff members should report offers of gifts and hospitality to their line manager who has responsibility for approving or declining the gift if they consider it to give rise to conflict of personal or official interest or if it might be interpreted as such a way.

The gift and hospitality form at Annex 1 should be completed and signed by the line manager for all gifts and hospitality of more than token value, regardless of whether they have been accepted or declined. Once approved, this form should be forwarded to the University Secretary who maintains a central register of gifts and hospitality.

Gifts and/or hospitality of nominal value may also be registered if the member of staff or their line manager considers it appropriate to do so in the interests of transparency.

It is important that all staff ensure that they register any gifts or hospitality they have received. This allows the University to evidence our compliance with the Bribery Act and protect members of staff, and the University, from allegations of improper conduct. The correct registration of any gift or hospitality received places the member of staff in a more favourable position in the event that an allegation about inappropriate gifts or hospitality is made at a later date.

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| Protocol Author – University Solicitor | Procedure Owner – University Secretary |
| Parent Policy Statement - Corporate Governance Policy Statement | Public Access or Staff Only Access – Public |
| Version 2 – 12 th March 2019 | Changes and Reason for Changes – Change to UWS staff titles |

ANNEX 1

GIFT AND HOSPITALITY FORM

Name :

School/Department :

I confirm that I have read and understood the University's Gift and Hospitality Protocol and in terms of the protocol declare that the following gift/hospitality was offered to and accepted by me.

| Date Gift Received/ Date of Event | Details of Gift/Event | Gift Received From/ Event Organiser (Name/Company) | Value (if not known, please insert estimated value or Not Known) |
|--------------------------------------|-----------------------|--|--|
| | | | |

Signed :Dated :

Approved by Line Manager :

Name :

Title :

Dated:

Once approved, please forward to the University Secretary