

Gifts and Hospitality Policy

Approved by the Board of Governors on 22 November 2017

Policy owner: Head of Finance

1. Introduction

- 1.1 The University is committed to the highest standards of integrity, probity and ethics in all its dealings and this policy sets out how the employees or officials of the University should act when offered gifts and hospitality.
- 1.2 If in doubt, personnel should consult the Head of Finance or the Head of Legal Services and Compliance.

2. Definitions

- 2.1 "Gifts and hospitality" is a collective term for the receipt or offer of gifts, meals, travel costs, entertainment, tokens of appreciation and gratitude, or invitations to events, functions or other social gatherings, in connection with matters related to the University.

3 Policy statement

- 3.1 It is University policy that all representatives of the University conduct business in an honest and ethical manner. The University takes a zero-tolerance approach to bribery and corruption and is committed to acting professionally, fairly and with integrity in all of its business dealings and relationships wherever they are conducted.
- 3.2 The giving or receiving of gifts and hospitality may give the impression of undue influence over a decision and may be considered a bribe. The principles and guidelines set out in section 3 and 4 of this policy must therefore be adhered to at all times.
- 3.3 This policy should be read in conjunction with the University's Anti-Bribery and Corruption Policy and its Ethical Fundraising Policy and Donors' Charter.

4 Scope

- 4.1 Normal, reasonable and proportionate hospitality given or received as part of the University's wider student, commercial, promotional and marketing activities which is genuinely aimed at building a good business relationship and improving the profile of the University is allowable, within limits (see below).
- 4.2 The giving or receipt of gifts and/or hospitality is permitted provided that the following requirements are met:

- (a) taking into account the reason for the gift and/or hospitality, it is of an appropriate type and value and given at an appropriate time; and
- (b) the giving of hospitality involving the use of University resources (which is not limited to simply the expenditure of money by the University and includes the use of University premises or facilities, for example) must be in pursuance of achieving a recognised goal of the University. University premises and facilities are available for private hire through Bath Spa Venues Limited; and
- (c) the gift and/or hospitality complies with local law. The practice of giving gifts and hospitality varies between countries and regions, what is normal and acceptable in one region may not be in another; and
- (d) it is given to the University rather than to an individual; and
- (e) it is given openly, not secretly.

4.3 Gifts or hospitality designed to influence, to obtain or reward business, or which are made with the suggestion of a return favour being expected, or where there is a suggestion of secrecy, must be declined.

4.4 Every effort must be made to refuse an offer which is not consistent with this policy, without offending the person or organisation making the offer. If the intended recipient feels that gift or hospitality cannot be refused, because of local conditions or circumstances, it should be declared to the Head of Finance and the Head of Legal Services and Compliance on return to the University.

4.5 Gifts of cash or cash-equivalent gifts should not be made by an employee or official of the University. If such gifts are offered to any University employee or official, they should be politely declined or, where not possible to decline without causing offence, passed to the Head of Finance for use within an appropriate fund or bursary.

4.6 Philanthropic gifts to the University (rather than to individual employees or other members of staff) are gifts made without expectation of return. As such, philanthropic gifts are outside the scope of this policy. They may be made subject to certain conditions or to the carrying out of certain pre-conditions but this will not necessarily mean that they will fall within the scope of this policy. The receipt of donations or gifts of this nature is covered by the Ethical Code and Donors' Charter.

5 Gifts Register

5.1 The University maintains a gift register process, for both inbound and outbound gifts and hospitality, and it is essential that each occurrence is accurately recorded. Annual and individual occurrence limits on gifts and hospitality are also maintained, which can vary by country based on local financial benchmarks.

5.2 In any event, any gift or hospitality (or multiple gifts on the same occasion or in close succession) either received or given by employees or officials of the University which

has/have an individual or cumulative monetary value of (or reasonably estimated to be) £50 or more should be notified to the Head of Finance so that it may be declared in the University's Gifts Register.

- 5.3 Where any offer of a gift or hospitality is declined, this should also be recorded on the register. The objective of the register is to preserve transparency regarding gifts and hospitality. Whilst the register will record whether an offer is accepted or declined, it is the offer that triggers a requirement to register rather than the response.
- 5.4 The Gifts Register will be reviewed quarterly by the Vice-Chancellor's Advisory Group as part of its review of the University's anti-bribery measures.

6. Breaches of this Policy

- 6.1 Any employee who breaches this policy may face disciplinary action, which could result in dismissal for misconduct or gross misconduct.
- 6.2 The University may terminate its relationship with any other individuals or organisations working on its behalf if they breach this policy.