Gifts and Hospitality Policy

1 Introduction

1.1 This policy covers the receipt of gifts and hospitality to all College Staff received in the course of their day to day work or as a result of their employment.

1.2 All decisions made by staff on the acceptance of gifts and hospitality must be able to withstand both internal and external scrutiny. Common sense should prevail and gifts or hospitality should not be accepted if the individual or the College would be embarrassed if this became public.

1.3 Gifts or hospitality should never be accepted if they could be perceived as compromising the integrity of the individual or the College. The Bribery Act 2010 requires the College to take steps to prevent bribery both of and by its employees. Any alleged incidents of bribery will be investigated under the College’s Anti-Fraud Policy and could lead to the prosecution of the individual(s) concerned.

2 Accepting Gifts and Hospitality

2.1 Gifts and hospitality resulting from normal commercial business relationships, academic visits or work related overseas visits

2.1.1 Every department should keep a gift and hospitality book. All members of the department must record any gift or hospitality received with the exception of small business gifts like diaries and calendars. Brief details of the organisation or the individual making the gift or providing hospitality must be recorded.

2.1.2 Any gifts accepted, should be accepted on behalf of the College. Gifts that appear to have a value of more than £50 should be refused or returned. In some cases it might be more suitable to accept the gift but raffle it for charity. The donor should be thanked and informed of the amount raised and the charity to which it was donated.

2.1.3 Excessive hospitality should be refused. As a guide, one might only accept hospitality that one could reciprocate in a similar fashion. The acceptance of corporate hospitality where one is part of a group being entertained, including individuals from a number of organisations, would normally be reasonable.
2.1.4 Staff on overseas visits may receive considerable hospitality from their hosts. It is expected that it will normally be appropriate to accept this hospitality, subject to the overriding requirement in 1.3, but the details must be recorded in the gift and hospitality book on the member of staff’s return to the UK. Any concerns about the level of hospitality being provided should be raised with the employee’s line manager as soon as possible.

2.1.5 Gifts and hospitality for family members should not normally be accepted. If accepted, for example to enable staff members to attend conferences on behalf of RHUL, they must be agreed in advance and recorded in the gift and hospitality book.

2.1.6 If it is judged that following these guidelines might cause offence to the donor, then the Principal should be notified and a judgement will be made. A record must be kept of any unavoidable acceptance.

2.2 Gifts and hospitality resulting from the Staff/Student Relationship

Gifts from students should be refused if their timing or value could in any way be construed as influencing academic judgement. All gifts of this sort likely to have a value of over £20 must be recorded in the gift and hospitality book.

2.3 If it is judged that following this guideline might cause offence to the student, then the Principal should be notified and a judgement will be made. A record must be kept of any unavoidable acceptance.

3 Definitions

3.1 Hospitality

‘Hospitality’ is defined as entertainment, refreshments, meals, leisure activities (e.g. Tickets/admission to sporting events, concerts, theatre, recitals, exhibitions, food and drink, and travel). The provision of say, tea/coffee and biscuits with a meeting, or a taxi ride (unless a considerable distance) need not be recorded.

3.2 Gifts

Examples of gifts might be souvenirs of foreign visits (commemorative plaques, plates, pens, prints, clocks, ornaments, paperweights, wall-hangings), books and ‘thank-you’ gifts such as bottles of wine. ‘Gifts’ sent out to a large number of people for publicity and profile-raising purposes e.g. diaries/calendars and other promotional materials need not be recorded.
4 Bribery

Any member of staff who believes that gifts or hospitality are being offered in an attempt to bribe him or herself, or another member of the College, should report the matter immediately in accordance with the Anti-Fraud Policy.

5 Associated Policies

Anti-Fraud Policy and Response Plan
Expenses Policy
Anti-Bribery Policy

Equality Impact Assessment – no impact identified

College Secretary and Head of Governance
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