



University of the Highlands and Islands

# Acceptance of Gifts and Hospitality Policy

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POL081

Lead Officer (Post):	Vice Principal - Operations
Responsible Office/ Department:	Operations
Responsible Committee:	Finance and General Purposes Committee
Review Officer (Post):	Director of Finance
Date policy approved:	25/04/2014
Date policy last reviewed and updated:	27/05/2022
Date policy due for review:	27/05/2024
Date of Equality Impact Assessment:	27/05/2022
Date of Privacy Impact Assessment:	Not required

## Policy Summary

OVERVIEW	Awareness and compliance with this policy is required for staff to maintain the highest standards of propriety and professionalism and to avoid placing themselves in a position where their integrity might be called into question. Compliance will minimise risk to UHI and its staff.
PURPOSE	This policy forms part of the University of the Highlands and Islands' governance arrangements.
SCOPE	All UHI employees, temporary and agency staff and consultants.
CONSULTATION	The policy will initially be reviewed by the university's Information and Consultation Committee and the Senior Management Team prior to consideration by the Finance & General Purposes Committee.
IMPLEMENTATION & MONITORING	The policy will be implemented through the Senior Management Team of the University. The administration i.e. Register of gifts and hospitality will be maintained by the PA to the Secretary.
RISK IMPLICATIONS	Failure to maintain standards of propriety and professionalism.
IMPACT ASSESSMENT	Equality Impact Assessment: 27/05/2022
	Privacy Impact Assessment: Not required

## **1.0 Overview**

The University of the Highlands and Islands requires its staff to act with honesty and integrity at all times.

The University is committed to the highest standards of integrity and to ensuring it adheres to and promotes best practice on the receipt of gifts, hospitality and other benefits.

## **2.0 Purpose**

This policy forms part of the University of the Highlands and Islands' governance arrangements. The purpose of the policy is to ensure that all staff are aware of how to react to unsolicited gifts and hospitality offered in the course of their University duties and comply with the requirements of the policy at all times.

## **3.0 Scope**

The scope of this policy is to apply all employees of the University or any subsidiary company including any temporary or agency staff or unpaid members of staff and voluntary workers. The policy applies to all activities of the University, whether related to research, teaching, commercial or other activities, and exists for the protection of members of staff and the University.

The University will expect any person or organisation performing services for it or on its behalf, to adhere to this policy or otherwise have equivalent procedures in place to prevent accusations of impropriety. These third parties include agents and others who represent the University and suppliers, consultants and private sector partners who perform services for the University or on its behalf, wherever located in the world.

## **4.0 Policy**

### **4.1 Principles**

This policy is of particular importance when staff are engaged in any formal procurement process for goods and services. It recognises the practical realities that there will be circumstances where the receipt of small gifts will be appropriate, that on occasion refusal of gifts could cause offence and be to the detriment of the University, and similarly that there are circumstances in which it is appropriate to accept offers of hospitality. Some general guidance is offered on personal retention of gifts and other benefits.

### **4.2 Definitions**

#### **1. Gifts**

##### **(a) Gifts from visitors to the University**

Gifts of a nominal or small value from visitors from other universities or organisations can normally be accepted without question. Frequently these are mementoes of the visitor's own institution/organisation. According to the nature of the visit and of the gift, it will be a matter of discretion whether the gift is retained by the individual to whom it was given, or retained by the University or department: the latter might be more appropriate in cases where the gift can be put on display.

Gifts of significant value are occasionally offered by 'official' visitors and it would normally be inappropriate to decline them. However, they must not be retained by the recipient for personal use, but must be regarded as University property. The appropriate location for their retention/storage/display will depend on the nature of the gift. The Secretary must be

consulted according to the nature of the gift and its value. Gifts of significant monetary value must not be retained at departmental level without such consultation.

Valuable gifts of a personal nature should not normally be accepted, and in any case only if Secretary or line manager is informed; see also the guidance in the final paragraph.

#### **(b) Gifts from others**

The foregoing applies to gifts from visitors with no formal or contractual relationship with the University. Gifts from individuals or bodies with, or wishing to have, a formal relationship with the University (e.g. applicants and students or their immediate relatives; suppliers; contractors etc) should not normally be accepted. This is particularly important if a formal procurement process for goods or services is being undertaken in which the individual or body may have an interest.

There will be limited exceptions to this general rule: for example, receipt of a small personal gift by a supervisor from a postgraduate student who has completed his or her studies would not be regarded as inappropriate, provided the monetary value of the gift was not significant. An exception can also be made in the case of promotional items such as diaries or calendars, and this could extend to items such as ties, scarves, golf umbrellas etc. The particular issue of gifts of books by publishers to academic staff is another area where exceptions to this general rule are acceptable, provided that the books received are relevant to the academic interests of the member of staff.

However, in all cases caution must be exercised in the receipt of items of any value, and it is essential that members of staff do not put themselves in a position where they might be regarded as receiving any benefit or gift as an inducement or reward for taking any action (or specifically not taking action) or showing favour. In any case of doubt, staff must consult the Secretary or line manager as appropriate. In the rare situation where refusal of a gift would give rise to offence detrimental to the University, the gift must immediately be declared to, and surrendered to, the Secretary who will make a decision regarding retention or disposal of the gift.

#### **(c) Hospitality**

University staff must avoid accepting gifts of hospitality that could be construed as offering an outside contractor or organisation an undue influence over their professional work. This is particularly important when staff are engaged in any formal procurement process for goods or services. Such hospitality could include meals, admittance to ticketed events, travel packages, and other hospitality services extended to a University staff member or their immediate family at no cost or at preferential rates by an interested outside individual, contractor or other party, whether or not the offer was extended in that staff member's official capacity. This also includes add-ons that might be attached to a trip for official University business, such as preferential hotel rates or free entertainment while at a professional conference or on a recruiting trip.

In the course of attending events hosted by outside organisations, University staff members must be alert as to the propriety of any supplementary offer of hospitality and whether it could be seen as offering influence or advantage to an outside party.

However, this guidance should not be construed as extending to hospitality normally offered as part of a professional activity, for example, as part of conference attendance or as an external examiner. There is nothing untoward about such offers, which are well-established non-preferential practices, and would not normally be construed as an attempt to gain influence with the University. A further area of activity where it may well be in the University's interests that hospitality is accepted relates to fundraising and the building of relationships with potential donors: this is of particular relevance to staff dealing with philanthropic giving and alumni.

There will, more generally, be occasions when it is in the University's interests for an offer of external hospitality to be accepted. When determining whether to do so, staff must take into account whether the offer is made through an official channel or direct to the individual; whether the offer is generally available or targets the individual; whether the offer could be construed as giving an interested party an advantage in negotiations or other interactions with the University and conversely whether declining the offer may have significant adverse consequences for the University.

Staff members must refuse offers which unduly benefit themselves as individuals and/or could give an outside party undue influence or advantage. In any case of doubt, staff must consult the Secretary or line manager as appropriate. All offers of hospitality accepted by University staff should be reported to the PA of the Secretary who maintains a register, and a record kept by the staff member.

#### **(d) Other Benefits**

There are few other benefits offered to University staff by third parties, but staff must be alert to the need for caution should such circumstances arise. Examples might include sponsorship and the offer by a supplier of a discount for the purchase of an item for personal use not generally available to University staff. Prudence dictates that such benefits should not normally be accepted, and certainly not on a large scale or without informing the Secretary.

#### **General Guidance on Personal Retention of Gifts and Other Benefits**

In considering whether a gift or benefit should be retained personally, the concept of proportionality will be of some relevance. That is to say, considerations of the value of the gift/benefit in relation to the circumstances in which it is given or to the means of the donor. However, the absolute value of a gift/benefit is at least as important as a criterion. Whilst this will always be a matter of judgement, as a guide it is suggested that a gift/benefit worth more than £50 should not normally be retained personally, and only after consultation with the Secretary.

If you receive a series of gifts or hospitality exceeding £50 in any rolling twelve month period then this should be recorded in the gifts and hospitality register.

#### **4.3 Links with Other Policies**

The Acceptance of Gifts and Hospitality policy is supported by related university policies including:

- Anti Bribery Policy
- Disciplinary Policy
- Conflict of Interest Policy
- Procurement Policy
- Financial Regulations
- Public Interest Disclosure Policy
- Use of Consultants Policy

#### **5.0 Roles and Responsibilities**

The Vice Principal Operations of the University is the policy owner and thus has overall responsibility for the creation, implementation, monitoring and review of this policy. In addition, the Vice Principal Operations has primary responsibility for monitoring compliance with the policy and for ensuring that instances of suspected inappropriate acceptance of gifts/hospitality are investigated appropriately.

### 5.1 Role of Finance and General Purposes Committee

The Finance and General Purposes Committee is responsible for approving this policy on behalf of the Court and ensuring arrangements are in place for monitoring compliance.

### 5.2 Role of the Senior Management Group

- Implementing the Acceptance of Gifts and Hospitality Policy and ensuring compliance
- Communicating the policy to staff and other stakeholders.
- Ensuring that everyone in their area of responsibility understands the policy and implements it where appropriate.
- They inform the Vice Principal Operations immediately when they are notified of any concerns.

### 5.3 Role of Members of Staff

- All members of staff must read and adhere to the guidelines contained in this policy.
- Raise concerns immediately with their line managers
- Follow University guidance and best practice when involved in activities relating to the procurement of goods, services or works, or using overseas or other agents or third parties.

### Version Control and Change History

Version	Date	Approved by	Amendment(s)
0	07 February 2014	Fiona M Larg	Policy established (Draft)
1	25 April 2014	Fiona M Larg	Final version approved by Court
2	21/12/2016	Head of Governance and Records Management	Moved existing policy to new policy template. Replaced existing cover sheet.
3	27/05/2022	Director of Finance	Updated job titles
4			

**Appendix 1**

**Policy on Acceptance of Gifts and Hospitality**

**University of the Highlands and Islands**

**Register of Gifts/Hospitality Received**

<b>Name:</b>	
<b>Job Title:</b>	
<b>Department:</b>	

**Details of gift or hospitality received**

<b>Brief description of item:</b>	
<b>Provided by:</b>	
<b>Reason for gift or hospitality:</b>	
<b>Date of provision:</b>	
<b>Estimated value:</b>	

**Signed:** .....

**Date:** .....