



# POLICY ON GIFTS, HOSPITALITY AND BRIBERY PREVENTION

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## 1. Introduction

- 1.1 It is the University's policy and practice to conduct its business in an honest and ethical manner. The University takes a robust approach to bribery and corruption and is committed to acting professionally, fairly and with integrity in all of its business dealings and relationships throughout the world.
- 1.2 The University will uphold all laws relevant to countering bribery and corruption including the [Bribery Act 2010](#) ('the Act'), in respect of its conduct both in the UK and abroad.
- 1.3 In UK law bribery and corruption are punishable for individuals by up to ten year's imprisonment and if the University is found to have taken part in corruption it could face an unlimited fine, be excluded from tendering for public contracts and face damage to its reputation.
- 1.4

- 3.2 The Policy also applies to any other person associated with the University, who performs services for and on behalf of the University anywhere in the world. This includes the University's agents, brokers, subcontractors, representatives, distributors, consultants and other service providers. The University expects those persons to abide by this policy or have in place equivalent policies and procedures to combat bribery and corruption.
- 3.3 To help communicate our expectations to others, this policy will be made available to our commercial and other partner organisations and disseminated to others whom we work. This means in many cases the policy should be discussed with any party whom the University is considering doing business with to ensure they understand our standards as an organisation.
- 3.4 In this Policy 'third party' means any individual or organisation that individuals may come into contact with during the course of their work for the University, and includes students, external funders, customers, suppliers, distributors, business cont

## 5.2 Giving and Receiving Gifts

5.2.1 When considering whether a gift should be given or accepted the following key responsibilities should be considered:

- x Is it appropriate to accept the gift? Consideration should be given to the nature of the gift, its value, who it is being offered by, and the intention.
- x If the estimated value of the gift either given or accepted, is in excess of £100 then it must be registered with the University Secretary and Clerk to the Board of Governors. The details of how to do this are set out at para 2. Staff may register or obtain consent on a voluntary basis in relation to gifts below the relevant figures.

5.2.2 Unless staff have been informed otherwise, they may accept:

- x A gift of nominal value, such as an advertising novelty, when it is customarily offered to others having a similar relationship with that individual or organisation;

5.2.3 Items of property must be accepted on behalf of the University and handed into the University Secretary or the Finance Office to be used for fundraising for the University's charity of the year or other charitable cause as decided by UEB;

5.2.4 Gifts which at face value appear low value but could have the potential to reach a value in excess of £100 (for example, entry into a prize draw or lottery, or have a higher value) should be valued at in excess of £100.

## 5.3 Hospitality – Giving and Receiving

5.3.1 Hospitality given or received by staff on university premises and using catering services procured using the appropriate University process does not need to be recorded or declared.

5.3.2 All hospitality and entertaining must be in accordance with the 3 core principles of the University's Travel and Expenses Policy:

- x Value: The University's resources are used responsibly to achieve its goals. Value considers well-being, safety and security, the environment and cost effectiveness
- x Integrity: Colleagues are trusted to do 'the right thing' and to ensure that the proposed expenditure is necessary, and that costs are reasonable, legitimate and incremental to normal expenditure.
- x Approval before expenditure: All expenditure should be appropriately approved before any costs are committed.

5.3.3. The costs of hospitality and entertaining should be, and be seen to be, reasonable in line with the Value principle, and should not create a personal benefit for any attending the event. Wherever possible, guidance should be sought from your budget manager/head of School/Institute or Professional Service before incurring any expenditure on business hospitality or entertainment i.e. entertaining external guests, should only be reimbursed if the department is satisfied that it was incurred in the course of departmental or University business.



- d) Accept a gift or hospitality from a third party if it is known or suspected to be offered or provided with an expectation that either a personal or business advantage will be provided to the University in return;
- e) Accept a gift or hospitality from a third party who is tendering for a contract to be awarded by the University either on its own or jointly with other parties and for a period of three months after the award of the contract;
- f) Deliberately ignore any of the above;
- g) Threaten or retaliate against another member of staff who has refused to commit a bribery

A record of all major gifts accepted and declined will be maintained by the University Secretary and Clerk to the Board of Governors

## 7. Facilitation payments

- 7.1 The University does not make, and will not accept, facilitation payments or “kickbacks” of any kind. Facilitation payments are typically small, unofficial payments made to secure or expedite a routine government action by a government official. They are not commonly paid in the UK, but are used in some other jurisdictions.
- 7.2 If staff are asked to make a payment on the University’s behalf, they should always be mindful of what the payment is for and whether the amount requested is proportionate to the goods or services provided. Staff should always ask for a receipt which details the reason for the payment. If staff have any suspicions, concerns or queries regarding a payment, they should raise these with the University Secretary and Clerk to the Board of Governors
- 7.3 All staff must avoid any activity that might lead to, or suggest, that a facilitation payment or kickback will be made or accepted by the University.

## 8. Staff Responsibilities

- 8.1 S.176.7 (r3.2 (y)3.34 ( w)-6f (t)-5. C 24 (a. C ).2 ( )10.)-2.5 (3 (n)2.2 (t1-4.3 (t)-5.9 (u)-2.9 (o)6 (q)-0.8 ( )-t, n itybely.  
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Requests to your line manager for written approval of gifts or hospitality (where required) must



- 12.2 The University Secretary has primary and day to day responsibility for implementing the Policy, for monitoring its use and effectiveness and dealing with any queries on its interpretation.
- 12.3 The University Secretary will monitor the effectiveness and review the implementation of this policy, regularly considering its suitability, adequacy and effectiveness. Any improvements identified will be made as soon as possible.

Owner	University Secretary (unisec@worc.ac.uk)
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