

# POLICY ON GIFTS AND HOSPITALITY AND BRIBERY PREVENTION

## 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'

- 3.1 This policy applies to all individuals working for and on behalf of the University of Worcester at all levels and grades and includes all employees (whether permanent, fixed term or temporary), members of the University's Board of Governors, honorary staff, trainees, seconded staff, casual staff, agency staff, volunteers, interns, agents, sponsors, or any other person associated with the University or any of its subsidiary companies (collectively referred to as 'staff' for the purposes of this policy).
- 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, sub-contractors, 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 with 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 contacts, agents, advisers, and government and public bodies, including their advisors, representatives and officials, politician and political parties.

#### 4. What is Bribery?

##### 4.1

obtain consent on a voluntary basis in relation to gifts or hospitality below the relevant figures.

5.2 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 on the register.

### 5.3 Giving Gifts and Hospitality

5.3.1 Staff may not, directly or through others, offer or give any money, gift, hospitality or other thing of value to an official, employee or representative of any supplier, customer or any other organisation, if doing so could reasonably give the appearance of influencing the organisation's relationship with the University.

5.3.2 Staff may:

- Give gifts of a nominal value, such as University of Worcester pens and advertising novelties;
- With prior line management approval, provide University corporate gifts, such as prints, books, and other commemorative items;
- With prior line management approval, provide meals and other entertainment at venues outside the University, provided that the expenses are kept at a reasonable level. For the avoidance of doubt, the per capita cost of a meal should not exceed £100 and would normally be much less;
- With prior line management approval, provide meals and overnight accommodation on the University campus, including Barrington House, where these are reasonable and in the normal course of University business or events.

### 5.4 Receiving Gifts and Hospitality

5.4.1 Staff or any member of their family should not, directly or through others, solicit or accept money, gifts, hospitality or anything else that could influence or reasonably give the appearance of influencing the relationship with that organisation or individual.

5.4.2 Gifts or hospitality may not be accepted, irrespective of value, which may influence or be seen to influence such situations as the outcome of an exam, the acceptance of a student into the University, the award of business (contract) or the use of the University's resources.

5.4.4 Gifts or hospitality with a value of more than £100 should be treated as follows:

- Prior line management approval should be obtained before they can be accepted;
- If accepted, they must be registered in accordance with section 10.2;
- Items of property must be accepted on behalf of the University and handed into the University Secretary and Clerk to the Board of Governors to be used for fund-raising for the University's charity of the year, nursery or other charitable cause as decided by UEB;
- 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 high re-sale value) should be valued at in excess of £100.

5.4.5 If an excessive gift or hospitality is found to have been accepted, then the circumstances will be discussed with the member of staff and steps agreed to ensure that the acceptance of the gift or hospitality does not influence a decision or situation in favour of the giver. Acceptance of an excessive gift or hospitality, especially on more than one occasion or where it is found to have influenced decisions inappropriately, against University policy or potentially illegally, will lead to the appropriate disciplinary procedures being followed.

## 6. What is not acceptable?

6.1 It is not acceptable for staff to accept gifts or hospitality from donors or potential donors in excess of £100 (including the value of any cash or vouchers) without the prior approval of the University Secretary and Clerk to the Board of Governors.

7. **Major Gifts or Donations to the University**

- 7.1 The University accepts funding from a wide variety of public and private sector partners from across the globe, to support the delivery of the University's mission, as articulated in its Strategic Plan.
- 7.2 As an exempt charity and a seat of higher education and scholarship, the University has a responsibility to ensure that the processes of securing and receiving funds to support the life and work of the University do not compromise its integrity, the trust of its supporters or its commitment to students, staff and the communities it serves.

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## **11. Risk Assessment and Knowing Who You are Dealing With**

- 11.1 The University Secretary and Clerk to the Board of Governors will review annually the corruption and bribery risk that the University faces as part of the annual review of the institutional Risk Register.
- 11.2 It is also the responsibility of all staff to bring to the attention of the University Secretary and Clerk to the Board of Governors any potential new risk in relation to the scope of this policy when it arises, rather than waiting to report it in the annual risk assessment.
- 11.3 All staff must understand who they are doing business with and guidance on this issue can be obtained from the University Secretary and Clerk to the Board of Governors. This process is known as due diligence.

## **12. Reporting Concerns**

- 12.1 Concerns about compliance with this Policy should be reported to the University Secretary and Clerk to the Board of Governors, or in the case of staff, the University's Whistleblowing Policy can also be used.
- 12.2 Staff who refuse to accept or offer a bribe, or those who raise concerns or report another's wrongdoing are sometimes worried about possible repercussions. The University encourages openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken.
- 12.3 The University is committed to ensuring no one suffers any detrimental treatment as a result of refusing to take part in bribery or corruption, or because of reporting in good faith their suspicion that an actual or potential bribery or other corruption offence has taken place, or may take place in the future. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. Staff who believe they have suffered any such treatment should inform Human Resources immediately.

## **13. Responsibility for and Monitoring of the Policy**

- 13.1 The University Secretary and Clerk to the Board of Governors has overall responsibility for ensuring that the Policy complies with the University's legal and ethical obligations, and that all those under the University's control comply with it.
- 13.2 The University Secretary and Clerk to the Board of Governors 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.
- 13.3 The University Secretary and Clerk to the Board of Governors 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



### Registration of Gift or Hospitality

Name of member of staff
Department
Date of offer or receipt
Description of the hospitality or gift
Value of hospitality or gift (estimate if value isn't known)
Was the gift or hospitality accepted?      YES/NO (delete as appropriate)
Was written approval given to accept the gift or hospitality? YES/NO If a gift was accepted has the gift been donated for fund-raising for the University's charity of the year?    YES/NO

If NO – why not?