

UK Research and Innovation

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Gifts and Hospitality Policy

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Policy Statement

This policy covers the offering and acceptance of gifts and hospitality and the important role that the gifts and hospitality register(s) play in ensuring transparency and compliance with the seven principles of Public Life. It is underpinned by the UKRI Code of Conduct.

This policy applies to all UKRI employees. For the purpose of this policy, the use of the word “employee” covers UKRI employees on permanent or fixed term contracts as well as persons who are on secondment to the UKRI and non-employees such as non-executives, students, visiting workers, contractors, centres/institutes and other persons carrying out work on behalf of the UKRI.

The objectives of this policy are to ensure that all employees are aware of their responsibilities when offered, accepting or offering gifts and hospitality.

Gifts or hospitality (offered or received by employees) must be given voluntarily, without compensation and can sometimes be a legitimate part of the pursuance of normal business relationships. However, some gifts and hospitality can be construed as asserting improper influence on decision making. Special consideration is required when this situation arises.

This policy is fully endorsed by the UKRI Chief Executive and the Audit, Risk, Performance and Information Committee. Adherence will ensure that UKRI activities are compliant with legal and ethical requirements and related policies (e.g. whistle-blowing).

1. Introduction and Purpose

- 1.1 Good governance in public sector organisations recognises the need for arrangements for preventing, countering and dealing with gifts and hospitality. There is no reason to automatically assume that the acceptance of gifts and hospitality affects decision-making, but as a major funding organisation, we must be vigilant about the risk, and about how our behaviour might be perceived. Having appropriate policies in place helps to govern how we should behave in these situations. The purpose of this policy is to ensure that all staff are aware of their responsibilities in relation to gifts and hospitality, including our duties as individuals to declare these.
- 1.2 This policy covers overseas activities as well as those in the UK, particularly in cases of overseas funding where new relationships are being pursued and developed.
- 1.4 Any member of staff who breaches this policy may be subject to the UKRI Disciplinary Policy [\[link\]](#).

2. Principles

- 2.1 UKRI is committed to establishing and applying appropriate standards of regularity and propriety and requires all employees at all times to act honestly and with integrity and to safeguard the public resources for which they are responsible. UKRI employees

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are required to conduct themselves in accordance with the UKRI policy on Code of Conduct.

2.2 UKRI is committed to applying positive cultures and behaviours and aims to foster an environment which enables staff and representatives to operate effectively in line with objectives of the organisation, and to provide confidence to Government and wider public that the organisation is being managed effectively including through transparency of its operations.

2.3 Gifts or hospitality (offered or received by employees) must be:

Appropriate – justified and relevant to the event;

Proportionate – should not be excessive

Transparent – recorded in the Gifts and Hospitality Register and made available for inspection/review

Alcohol - Gifts of alcohol should be sensitively declined where possible. Irrespective of the value, this should be recorded on the register.

2.4 Centres/Institutes receiving or giving gifts are bound by this policy and have a designated individual fulfilling the roles set out here for the GARI Business Partner-

2.5 This policy is fully endorsed by the Chief Executive and Audit Committee of UKRI. Adherence will ensure that UKRI activities are compliant with legal and ethical requirements and related policies (e.g. whistle-blowing).

2.6 The Dep Head of Governance Risk, Assurance and Information will be responsible for ensuring that the policy is reviewed every 2 years or in the event of any legislative changes as required. Trade Unions and Staff Representatives may request that the policy be reviewed.

3. Definitions

3.1 A **gift** is defined as an item or items of a material nature that have an intrinsic financial value and are given, without the expectation of receiving anything in return.

3.2 **Hospitality** is defined as the act or practice of being hospitable; the reception and entertainment of guests, visitors, or strangers, with liberality and goodwill.

4. Policy Scope

4.1 This policy supplements the existing UKRI policies on: Code of Conduct; Disciplinary policy and Conflicts of Interest.

4.2 For the purposes of this policy the use of the terms 'individual' and 'employee' cover UKRI employees on permanent or temporary contracts; persons who are on secondment to UKRI; and non-employees such as students, contractors and other persons carrying out work on UKRI premises and/or on behalf of UKRI.

4.3 This policy also covers the actions of any person acting on behalf of UKRI (Associated Person as defined by the Bribery Act)

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- 4.5 A list of relevant legislation, regulations and supporting frameworks that provide background to this, as well as related UKRI policies and strategies are listed in Appendix 1.
5. **Reporting Concerns**
- 5.1 Employees should report any suspicions to their line manager as soon as possible. Employees can report their suspicions to the Deputy Director, UKRI Governance Assurance Risk and Information Governance (DD GARI) if they are reluctant to discuss their concerns with their line manager.
- 5.2 Employees and Non UKRI staff (external) may also report any suspicions through the Fraud e-mail address (reportfraud@ukri.org)
- 5.3 If the employee feels unable to raise their concerns internally, they may raise them in accordance with the UKRI Whistleblowing Policy.
6. **Offering/Giving - Gifts and Hospitality on behalf of UKRI**
- 6.1 It is not the normal policy of UKRI to purchase or offer gifts/hospitality to external organisations or individuals. However, where there is a clear business need, small value gifts or hospitality of a promotional nature are permitted in the context of employee, Board Members or public events. These are most likely to form part of the UKRI's public engagement activities.
- the cost of gifts or hospitality must be proportionate, established beforehand and will be subject to agreed financial limits and normal lines of authorisation.
 - gifts and hospitality, which exceed the agreed financial limit, offered for cultural reasons should be approved in writing by your Director (or of equivalent seniority) and recorded in the Gifts and Hospitality register.
- 6.2 Delegated limits:
- the UKRI Chief Executive has delegated authority to provide gifts to a cumulative value of £5,000.
 - each Council Executive Chair has delegated limits of £100 per transaction
- 6.3 All gifts provided should adhere to this policy and must be recorded in the Gifts and Hospitality Register
7. **Receipt - of Gifts and Hospitality**
- 7.1 All other staff should refer to their respective travel and subsistence limits with regards to the receipt of Gifts and Hospitality. It will be the responsibility of each respective Council Executive Chair to authorise any receipt of gifts and hospitality in excess of the respective limits. In general staff should not use their authority or office for personal gain and should seek at all times to uphold and enhance the standing and reputation of UKRI through compliance with the "Seven Principles of Public Life."
- 7.3 Gifts should not be accepted where they may appear to be disproportionately generous or could reasonably be construed as an inducement to affect a business decision. Gifts of a non-trivial nature should not be accepted by an individual. All employees are responsible for ensuring that any gifts offered (whether accepted or

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not) are recorded in the Register if they are not of a trivial nature. A gift will be considered trivial if it is less than £20 in value.

- 7.4 There may be occasions when to refuse a gift may cause offence. In these circumstances and those where a gift cannot be returned or refused, the gift should be accepted and surrendered to the your GARI Business Partner at the relevant site who will arrange for such surrendered gifts to be raffled for charity at an appropriate time.
- 7.5 Invitations to lunch/dinner/receptions and similar functions from external organisations may be accepted where the primary reason for acceptance is to discuss business matters either with representatives of the hosting organisation or with representatives of other organisations that have business interests or activities in common with UKRI.
- 7.6 Invitations to lunch/dinner/receptions and similar functions from external organisations may be accepted where the primary reason for acceptance is to represent or make a presentation on behalf of UKRI.
- 7.8 Where a prize is awarded the underlying motivation and business relevance should be assessed, particularly where this raises the profile of UKRI (e.g. Nobel). Where there is clear business justification these prizes can be accepted. As a rule of thumb entry into the competition should not be unduly restricted and all participants should have an equal chance of success.
- 7.9 Invitations of a social nature (eg sporting and cultural events) should be declined other than in the most exceptional circumstances where it can be clearly demonstrated that there is a compelling business need and that the social nature of the occasion is incidental to the business need.
- 7.11 Attendance to scientific events/hospitality - Attendance to events that don't attract any form of perceived financial benefit do not need to be authorised by Directors.
- 7.12 Particular care should be exercised by staff participating in procurement decisions or processes. Such staff should not under any circumstances accept gifts or hospitality from suppliers or potential suppliers. Subject to the above point it is recognised that participation in certain events such as supplier or industry conferences, seminars and trade shows can be of value in enhancing UKRI's knowledge and understanding of particular areas. For such events any hospitality element must be incidental to the event and relevant business information is expected to be gained through attendance.
- 7.13 Reimbursement of expenses by other organisations. Any offer payment, in cash or otherwise, to a staff member by a host organisation for expenses paid by, or due to be paid by, UKRI should be refused. Travel and accommodation can be funded by a host organisation if that organisation pays the travel provider directly or alternatively the host organisation can pay UKRI directly by bank transfer.

8. Recording - Gifts and Hospitality

- 8.1 Each member of staff has a personal responsibility to ensure that an audit trail exists for hospitality and all offers of gifts in excess of £20, and that all such offers are

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recorded in UKRI's Register of Gifts and Hospitality (whether the offer is accepted or not).

- 8.2 The DD GARI will maintain a Register of Gifts and Hospitality. It will be the responsibility of each Council and UKRI functional team to provide these records on a bi-monthly basis. The Register will be reviewed occasionally by UKRI Audit, Risk Assurance and Performance Committee.
- 8.3 Any offer of a bribe or commission should be reported immediately to the Chief Finance Officer in accordance with the UKRI's Counter Fraud and Bribery policy. The offer or acceptance of a bribe may constitute an offence contrary to the Bribery Act 2010.
- 8.4 Where there is any uncertainty about the value or status of a gift or hospitality offered it should be assumed that it exceeds the £20 threshold and it should therefore be recorded in the Register. In cases of doubt there should always be a presumption in favour of disclosure in the Register.

9. Time frame for reporting

- 9.1 In all cases of Gifts and/or Hospitality being offered staff should report within 3 working days. Where staff are overseas on official UKRI business the offer must be reported as soon as possible but always within 3 days of returning to work in the UK.

10. Submitting Returns

- 10.1 The following procedures for declaring/ managing gifts and hospitality will apply and will remain until such time as the UKRI Centre assumes responsibility.
 - Each Council and UKRI functional team will be responsible for recording and managing gifts and hospitality within their respective organisation.
 - non-executive board members should submit through the relevant secretariat for onward submission (either to the relevant host council or UKRI team)
 - each organisation will submit a record to the UKRI DD GARI on a bi-monthly basis. Nil returns will be required.
 - Research England and the UKRI Centre will adopt and record within the EPSRC register.

- 10.2 Each team should designate a member of staff at Director level for sponsorship of their returns. Nil returns are also expected from director level staff.

11. Policy Responsibilities

- 11.1 The HM Treasury handbook, Managing Public Money, sets out the general roles and responsibilities for people working in the public sector in relation to gifts and hospitality.
- 11.2 **Chief Executive Officer**

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The Chief Executive Officer is responsible for establishing and maintaining a sound system of internal control that supports the achievement of UKRI policies, aims and objectives. The system of internal control is designed to respond to and manage the whole range of risks that UKRI faces.

11.3 Chief Finance Officer

The overall responsibility for managing the risk of fraud and bribery is at Executive Board level and has been delegated to the Chief Finance Officer.

11.4 Line managers

All line managers are advised to seek advice from the UKRI Chief Finance Officer in respect of contravention of this policy.

11.5 All employees

Staff should report any concerns to their line manager, in accordance with the UKRI Fraud and Bribery Policy.

12. Policy Communication

12.1 This policy will be made available to all employees for reference and guidance purposes through the UKRI Intranet. All new employees will be made aware of the policy.

13. Training

13.1 Risks associated with gifts and hospitality will be embedded within the counter fraud training programme to support this policy.

14. Policy Benefits

14.1 Investment in this policy will benefit UKRI by:

- ensuring that all employees are aware of their responsibilities concerning fraud; and
- mitigating the risk (or perceived risk) of fraud occurring within UKRI.

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Appendix 1: Relevant Authoritative Bodies related UKRI Documents, Legislation, Regulations and Supporting Frameworks.

Authoritative Bodies

Department for Business, Energy and Industrial Strategy (BEIS)	Supports the scientific community and funds UKRI activities.
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Related Documents

The Fraud Act 2006	http://www.legislation.gov.uk/ukpga/2006/35/contents
The Bribery Act 2010	http://www.legislation.gov.uk/ukpga/2010/23/contents
Managing Public Money	https://www.gov.uk/government/publications/managing-public-money
UKRI Fraud and Bribery Policy	https://www.ukri.org/files/termsconditions/ukri-counter-fraud-and-bribery-policy-pdf/
UKRI Code of Conduct	https://www.ukri.org/files/termsconditions/rcukukriterms/code-of-conduct-pdf/
UKRI Disciplinary Policy	https://www.ukri.org/files/termsconditions/rcukukriterms/disciplinary-pdf/
UKRI Whistleblowing Policy	https://www.ukri.org/files/termsconditions/rcukukriterms/whistleblowing-pdf/
UKRI Conflicts of Interest Policy	Link to be confirmed
Cabinet Office Counter Fraud Framework	https://www.gov.uk/government/groups/counter-fraud-standards-and-profession#our-framework

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Appendix 2: Points of Contact

Name	Role	E-Mail
Ian Kenyon	UKRI Chief Finance Officer	Ian.Kenyon@ukri.org
Victoria McMyn	Director Governance Risk Assurance and Information	Victoria.mcmyn@ukri.org
Gifts and Hospitality	Submissions, requests and queries relating to the gifts and hospitality register or policy	giftsandhospitality@ukri.org
Fraud Line	Alternative method of reporting	reportfraud@ukri.org
Action Fraud	Reporting body of fraud referrals	http://www.actionfraud.police.uk/contact-us

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Appendix 3: Summary of Gifts and Hospitality Principles

Situation	Principle	Disclose in Register?	Other Action
Receipt of Trivial Gifts less than £20 in value (e.g. calendars, pens etc)	Acceptable in moderation	No	
Receipt of Gifts in excess of £20 in value (See paragraph 7.1 & 7.2 in respect to limits)	Decline Where it is not possible or appropriate to decline the gift, it should be surrendered to Head of Governance A gift should not be accepted if the cumulative value from any one organisation or individual exceeds £100 in any 12-month period or £20 for any one gift.	Yes	Surrender any gifts accepted to Dep Head of Governance Risk, Assurance and Information
Prizes (including cash)	Decline Cash prizes should be avoided, effectively a cash prize is an award and should have some constraints/conditions on the use of the cash	Yes	Surrender any gifts accepted to Dep Head of Governance Risk, Assurance and Information
Hospitality - Invitation to lunch/dinner/reception (See paragraph 7.1 and 7.2 in respect to limits)	Acceptable as long as there is a clear business benefit to UKRI	Yes	Seek permission in advance from Director
Invitation to social event	Decline – unlikely to be acceptable other than in most exceptional circumstances	Yes	
Invitation or gift from supplier or potential supplier	Decline	Yes	
Attendance at trade fairs, exhibitions, conferences etc with minimal hospitality	Acceptable	No	
Any doubts?	Declare in Register Consult Dep Head of Governance Risk, Assurance and Information	Yes	

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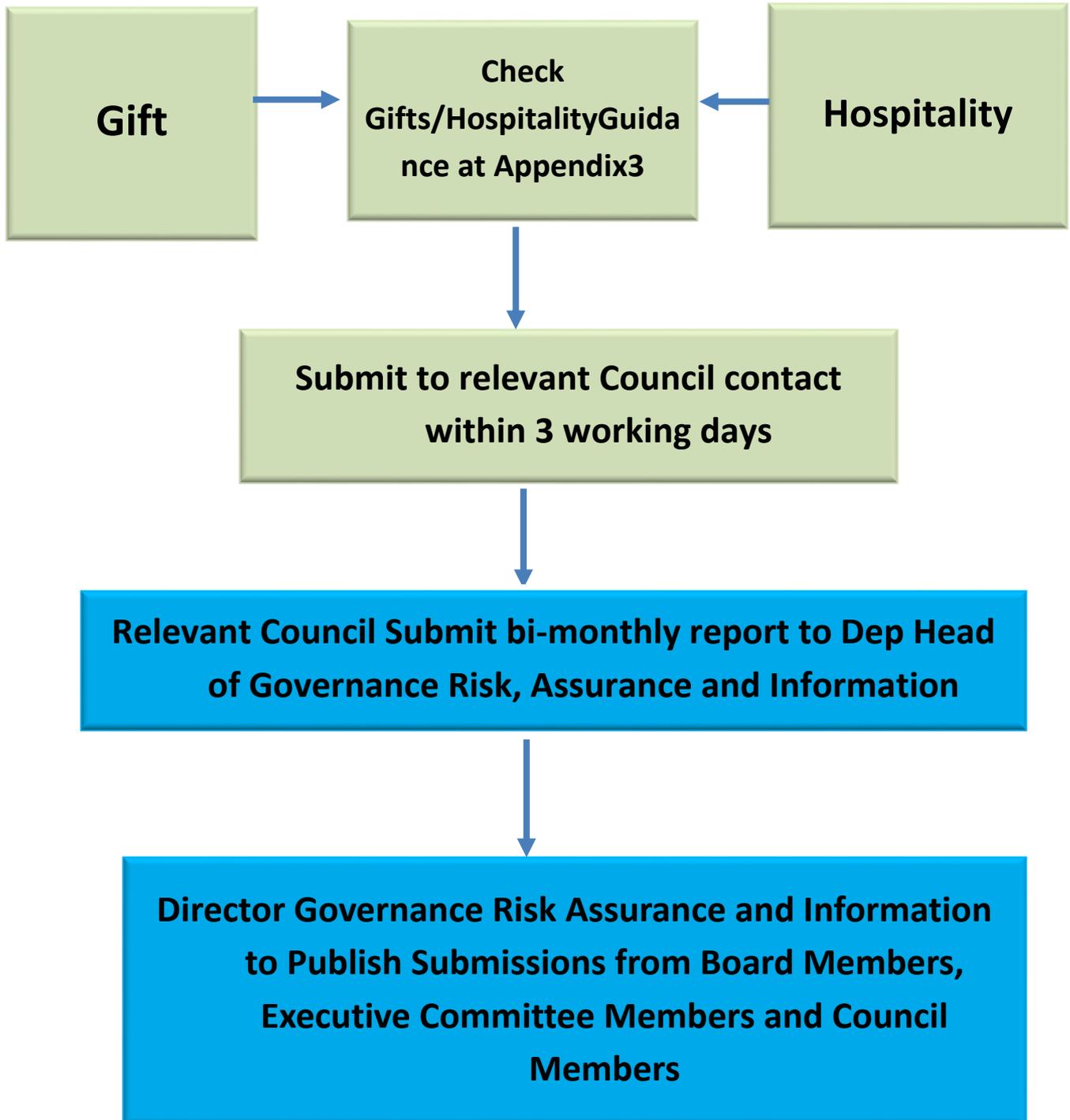
Appendix 4: Submission Form

See below a table providing a template for completing a return to declare gifts and hospitality:

Name	Email address	Date	Gift/Hospitality	Who gift/hospitality was received from	Value (£)	Result

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Appendix 5: Process Flowchart



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Appendix 6: Document Review and Version Control

Document Control	
Original Version	1.0
Effective From Date	1 July 2018
Approved By	Design and Delivery Sub Board
Date of Approval	10 April 2018
Date of Last Review	13 June 2018
Date of Next Review	1 July 2019
Retention Period	
Owner	Director of Governance Risk, Assurance and Information
Author	Brendan Harper, Investigations Manager UKRI

Version Control				
Version Number	Status	Revision Date	Author(s)	Summary of Changes

13 Amendment History.

Version	Date	Comments / Changes
1.0	9 February 2018	Terms and Conditions Working Group
1.0	20 February 2018	Terms and Conditions Working Group
1.0	1 November 2018	PFO and UKRI GARI