



UKRI Gifts and Hospitality

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Policy Statement

This policy governs the giving and receiving of gifts and hospitality for UKRI employees and all those acting on behalf of UKRI, including those employed on temporary or fixed term contracts. Adherence to this policy ensures UKRI is complying with its legal and ethical duties, acting with regularity and propriety, and strives to ensure the decisions employees and those acting on behalf of UKRI make are free from conflict and undue influence.

This policy is underpinned by the [Seven Principles of Public Life](#), the [Civil Service Code](#) and [Managing Public Money](#). It is also supported by a number of other UKRI policies, including the [Code of Conduct](#).

Accessibility and inclusion

UKRI is committed to promoting equality and to ensuring our Gifts and Hospitality Policy and process is fair and accessible to all users. We welcome and encourage you to contact giftsandhospitality@ukri.org with any feedback, queries, or concerns.

Management Statement

This policy will be reviewed every two years or to incorporate legislative change, where appropriate. This policy is owned and agreed by the Deputy Director Risk and Assurance (DDRA), in consultation with the UKRI Trade Unions and People, Finance and Operations Committee. An equality impact assessment has been completed.



Version Number	Status	Revision Date	Summary of Changes
Version 3.0	Draft	February 2024	Further updates following GIAA audit recommendations and consultation across UKRI
Version 2.0		October 2020	Updates following GIAA audit recommendations and consultation across UKRI

1. Purpose

- 1.1. This policy governs the giving and receiving of gifts and hospitality for UKRI employees and those acting on behalf of UKRI.
- 1.2. It sets out how UKRI expects employees and those acting on behalf of UKRI to conduct themselves when giving or receiving gifts and hospitality, and their duty to protect UKRI from the risk of undue influence on decision making, fraud, corruption, bribery and reputational damage.
- 1.3. Proper application of this policy ensures UKRI is compliant with government guidance, including [Managing Public Money](#).

2. Definitions

- 2.1. **Gifts** are something voluntarily donated, with no preconditions and without the expectation of any return. This may include loans for the useful life of an asset or sales, leases or transfers at below market value.
- 2.2. **Donations** are items voluntarily given or received. Donations are treated as gifts for the purposes of this policy.
- 2.3. **Hospitality** may include the giving or receiving of services, entertainment, social or sporting events, meals, refreshments, accommodation, travel or subsistence. This may include reimbursement, credits, or discounts below market value for any of the above.
- 2.4. **UKRI employees** are those directly employed by UKRI, including those employed on temporary or fixed term contracts. Also includes contingent workers and others acting on behalf of UKRI such as non-executives, students, visiting workers, contractors, monitoring officers and those involved in UKRI funding decisions.
- 2.5. **Normal UKRI business and governance activities** are defined as activities that further UKRI's aims and objectives. This includes formal UKRI meetings such as Committee and Council meetings, as well as external stakeholder events, conferences, speeches and other business or community engagement activities where UKRI has representatives in attendance.

3. Responsibilities

- 3.1. 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. Responsibilities can be delegated through the standard delegation process set out in the [UKRI Delegations Framework](#). Beyond this, responsibilities are as follows:
- 3.2. **All employees and those acting on behalf of UKRI**, must familiarise themselves with and follow this policy and relevant guidance, make declarations where appropriate and escalate concerns to their line manager or UKRI contact, designated governance teams or Internal Controls, giftsandhospitality@ukri.org.



- 3.3. **Line managers** are responsible for assessing and reviewing gifts and hospitality and all associated declarations, in line with policy before approving or rejecting via the [Gifts and Hospitality portal](#). They should escalate concerns to Internal Controls as and when they arise. They should bring this policy and associated guidance to the attention of employees and contingent workers they have responsibility for.
- 3.4. **Chief Executive Officer** is responsible as Accounting Officer for establishing and maintaining a robust 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 risks that UKRI faces.
- 3.5. **Executive Committee (ExCo) members** are responsible for maintaining an overview of the gifts and hospitality spend in their Council or area, and ensuring they stay within their annual delegated limit of £200 of total gifts given on behalf of UKRI. They are also responsible for assessing and reviewing gifts retained above £100, in line with policy, before approving or rejecting via the [Gifts and Hospitality portal](#). They may delegate this responsibility.
- 3.6. **Chief Finance Officer (CFO)** has delegated responsibility from Board for managing the risk of fraud and bribery. The system of controls covering gifts and hospitality spend is designed to identify activities across UKRI and compliance with the policy limits.
- 3.7. **Deputy Director Risk and Assurance (DDRA)** has responsibility for managing the delegation from DSIT, will approve gifts or hospitality outside Executive Delegations and has final decision-making authority on gifts and hospitality matters. They will review the quarterly assurance report from the Internal Controls team and should escalate to the CFO if required. They will be responsible for reporting any significant issues to the Audit, Risk and Assurance Committee, or routinely via the annual supporting evidence pack for the governance statement.
- 3.8. **Local governance teams** should maintain working knowledge of the policy and provide local advice for their area as required throughout the year.
- 3.9. **Internal Controls** will maintain the [Gifts and Hospitality Portal](#), provide advice/support and complete an assurance check of disclosures to ensure compliance with the policy each quarter. A report on the findings will be provided to the DDRA.

4. General principles of gifts and hospitality

4.1. In general, UKRI employees or those acting on behalf of UKRI should:

- avoid giving or accepting gifts, hospitality or benefits of any kind that may compromise their personal and professional integrity
- only give or receive gifts, hospitality or benefits where there is a clear business justification for doing so and where there is no risk of actual or perceived conflict of interest
- be aware that any gift or hospitality that is given or received, even if it is rejected, should be declared according to Section 7 below.

5. Giving gifts and hospitality on behalf of UKRI

- 5.1. Gifts or hospitality should only be given on behalf of UKRI if it is justified and relevant to UKRI's business and objectives.
- 5.2. It may be appropriate to give a gift for cultural or diplomatic reasons. Gifts or hospitality should be proportionate, not be excessive, expensive, lavish, overly frequent or regular.
- 5.3. Gifts or hospitality given should be transparently declared on the [Gifts and Hospitality Portal](#) according to this policy.



5.4. If given by UKRI, the following are **not** considered gifts or hospitality:

- hospitality provided as a part of UKRI's normal business or governance activities
- branded merchandise or UKRI promotional material
- prizes given by UKRI on the basis of academic, technical excellence or merit
- gifts or hospitality given in a personal capacity and not funded by UKRI (e.g. a leaving collection)

5.5. It is not appropriate or acceptable to give alcohol, either as a gift or as a part of hospitality. Alcohol will not normally be reimbursed and [UKRI's Travel and Subsistence policy](#) should be adhered to.

5.6. Donations are considered gifts. It may be acceptable to make a donation where assets have nil net book value (e.g. donations of old equipment at the end of its useful life). In this case, the transaction should be approved by the Finance Business Partner, guidance in the [UKRI Finance Manual](#) should be followed and the appropriate asset register updated.

5.7. UKRI has a strict, cumulative delegation (£5,000) on total gifts given, which is set by DSIT. Any gift or hospitality above this limit will require approval from DSIT and/or HMT, which must be sought via the DDRA and CFO.

5.8. Approval for any gifts or hospitality given should be by the relevant ExCo member, though they may choose to further delegate this authority. ExCo Members may approve gifts or hospitality up to a cumulative value of £200 per financial year. This is intended to cover low value, incidental gifts which may occur during the year. Once this limit is reached, approval is also required from the DDRA to ensure UKRI remains within its delegation.

5.9. Gifts or hospitality must be approved **before** they are arranged and/or purchased.

6. Receiving Gifts and Hospitality on behalf of UKRI

6.1. Gifts and hospitality offered to UKRI employees or those acting on behalf of UKRI should be politely declined where possible. Where there is a business justification to do so, such as when refusing a gift or hospitality would cause offence or damage to UKRI's reputation, a gift or hospitality may be accepted.

6.2. Gifts or hospitality may also be accepted where the UKRI employee or the individual acting on behalf of UKRI perceives there is a security or personal risk in declining or the receiver does not feel comfortable refusing. This should be reported immediately as a security incident on [UKRI Incident Reporting \(sharepoint.com\)](#). Securityhub@ukri.org can be contacted directly for support and guidance.

6.3. Gifts or hospitality from state representatives may also present a security risk. If a gift or hospitality is accepted from a state representative, this should be declared via the [Gifts and Hospitality Portal](#) regardless of value. Executive Chairs and Directors, and their Offices are the most likely targets for receiving gifts that could present a technical attack risk or lead to leverage to ask favours of an employee. Anyone acting on behalf of UKRI should escalate any security risks directly with securityhub@ukri.org. The Internal Controls team may also raise declarations with Security as a part of their assurance processes.

6.4. Where gifts or hospitality are accepted, they should be proportionate, not excessive or lavish, overly frequent or regular.

6.5. When received by UKRI, the following items are **not** considered gifts or hospitality:

- hospitality received as a part of UKRI's normal business or governance activities
- branded merchandise or promotional material, though discretion is required if branded merchandise is technical, high-value or desirable



- receipt of books, journals or other publications related to UKRI's work

- 6.6. **Trivial gifts** may be accepted and retained by the individual. Trivial gifts have a value of below £40 and might include low value 'promotional' gifts, such as calendars or diaries, personal gifts such as flowers, and low value gifts to be shared amongst a team, such as chocolates.
- 6.7. Where it is not possible to refuse a gift or hospitality or there is a business justification for accepting it, this should be approved by the line manager via the [Gifts and Hospitality Portal](#) and surrendered by the individual. Retaining gifts above £100 requires additional approval from the relevant ExCo member or person of similar seniority. Authority to approve may be delegated.
- 6.8. It is not appropriate or acceptable to accept alcohol as a gift. Where it is not possible to refuse or there is a business justification for accepting it, this should be approved by the line manager via the [Gifts and Hospitality Portal](#) and surrendered by the individual.
- 6.9. Discretion should be used in how to surrender a gift, but this could include sharing the gift amongst colleagues; displaying the gift in UKRI's office space; disposing of the gift; or, donating the item, equivalent value or proceeds to a suitable charity.
- 6.10. **Prizes** based on academic, technical merit or excellence are acceptable and may be retained by the individual or team. Prizes won from random prize draws, raffles, competitions or similar should be refused. Employees or those acting on behalf of UKRI should avoid entering prize draws/competitions of this nature when on UKRI business.
- 6.11. **Invitations to social, sporting or cultural events** should be declined unless there is a clear business justification. For example, it would be acceptable to attend a cultural event which had been funded by UKRI as a part of normal business activity.
- 6.12. **Gifts or hospitality from suppliers** should be declined irrespective of value. Those acting on behalf of UKRI should exercise caution attending events hosted by suppliers.

7. Managing and Recording Gifts and Hospitality on behalf of UKRI

- 7.1. The [UKRI Gifts and Hospitality Register](#) is accessed via the [Gifts and Hospitality Portal](#). All employees and those acting on behalf of UKRI are responsible for ensuring a clear audit trail exists for any gift or hospitality given or received, and that they are appropriately declared.
- 7.2. UKRI employees will have access and should use the [Gifts and Hospitality Portal](#) to make a declaration, those without access should contact their designated governance team or UKRI contact who will assist in making a declaration.
- 7.3. Approvers should assess and review all declarations promptly, in line with policy before approving or rejecting via the [Gifts and Hospitality Portal](#).
- 7.4. Any gifts and hospitality received, given, offered or declined must be declared via the portal within five working days of being offered and/or receiving the gift or hospitality. Gifts given by UKRI should be declared, assessed and approved before they are arranged and/or purchased via the [Gifts and Hospitality Portal](#).
- 7.5. If there is any potential conflict of interest related to gifts or hospitality, these must be reviewed with the line manager and mitigating actions recorded via the [Gifts and Hospitality Portal](#). Consideration should be given to whether the individual's declaration of interest record should be updated via the [Declaration of Interest Portal](#).



- 7.6. Any offer of a bribe or commission should be reported immediately 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.
- 7.7. Employees and those acting on behalf of UKRI should exercise judgment in applying this policy, recognising that it may not always be possible to opt out of events which include alcohol, dining or other hospitality, particularly with international stakeholders and/or where different cultural norms apply.
- 7.8. Normal UKRI business activities do not need to be declared unless there is the potential for a conflict of interest. If in doubt, employees or those acting on behalf of UKRI should make a declaration.

8. Failure to make a declaration

- 8.1. A failure to make full, accurate and timely declarations in line with this policy may result in investigations being undertaken in line with [Managing Performance and Conduct Policy](#) or the enforcement of terms and conditions of engagement. This may lead to disciplinary action, or termination of engagement.
- 8.2. Where appropriate, civil proceedings may be commenced to recover any losses incurred and or the incident may be reported to the Police or other appropriate law enforcement agency.

9. Seeking advice or reporting Concerns

- 9.1. Individuals may seek advice or report concerns on gifts and hospitality to their designated governance team, or giftsandhospitality@ukri.org.
- 9.2. Individuals may also report any concerns to the UKRI Fraud Team (reportfraud@ukri.org).
- 9.3. If an individual feels unable to raise their concerns internally, they may raise them through whistleblowing@ukri.org in accordance with the [UKRI Whistleblowing Policy](#).