

# The Bader International Study Centre

## Policy

# Gifts, Hospitality & Conflict of Interest Policy

Date created: 18/03/2019

Date revised:.

<b>Category:</b>	Administrative; Operational.	
<b>Name:</b>	Gifts, Hospitality & Conflict of Interest Policy.	
<b>Approval:</b>	Senior Management Team.	
<b>Responsibility:</b>	Vice-Provost and executive Director, Bader International Study Centre. Director of Finance and Assets, Bader International Study Centre.	
<b>Dates:</b>	<b>Approved:</b>	Click to select the date that the policy was first approved.
	<b>Last Revised:</b>	Click to select the date the policy was last revised.

<b>Definitions:</b>	
<b>Term:</b>	<b>Meaning:</b>
BISC	Bader International Study Centre.
HCE	Herstmonceux Castle Enterprises Limited.

<b>Purpose:</b>
<p>This policy provides a framework to ensure that staff at BISC are aware of their responsibilities in relation both to the giving and receiving of gifts and hospitality, and in situations where conflicts of interest may occur as a result of their BISC activities. The policy always aims to support staff to act with integrity and in a manner that is impartial and without favouritism or bias.</p> <p>It is a normal expectation that those having responsibility for decisions, particularly those which have financial considerations and effect, ensure that they distance themselves from any possibility of a conflict of interest between any aspect of their personal activities and matters which they are involved with as part of their work with BISC. It is expected that the following principles should guide the conduct of all members of staff:</p> <ul style="list-style-type: none"> <li>• Members of staff should always act with integrity</li> <li>• Members of staff should act in good faith and in the best interests of BISC</li> </ul>

<b>Scope:</b>
<p>This policy applies to all gifts and hospitality given or received by staff, and any conflicts of interest which may arise in the course of business activities within BISC and HCE. For the purposes of this policy, all references to BISC applies equally to HCE and the term staff refers to all staff and faculty employed by BISC or HCE.</p>



Policy:

## 1. Hospitality and Acceptance & Giving of Gifts

Modest hospitality is an accepted part of academic and business relationships. However, it is important that no-one should allow themselves to reach a position where they might be thought by others to have been influenced in making an academic or business decision because of accepting hospitality. It is important, therefore, that the frequency and scale of hospitality accepted should not be significantly greater than the BISC would provide in return in similar circumstances.

All offers of hospitality and gifts (given, received or offered, even if declined) with a value of over £100 must be recorded in the Hospitality Register, maintained by the Finance Office. In addition, for any hospitality or gift (given or received) with a value over £100, written permission must be obtained in advance from the Director of Finance & Asset, other SMT members or the Vice Provost and Executive Director.

Members of staff should always refuse offers of gifts or hospitality which they judge to be excessive. In general, meals may be accepted where they would be considered an extension of a work event, or other recognised proper occasions and the apparent costs of the hospitality are reasonable. Attendance at social events where the invitation is clearly made because of a connection with the BISC is acceptable provided the hospitality is not excessive.

During contract tender periods, no hospitality should be accepted from companies which may be involved in the tender process.

Academic and other staff members should not accept gifts from students unless the gift is given at the end of a term or academic year, thereby ensuring the gift cannot be linked to any influence on marking or grading decisions. Gifts received outside of this time period should be directed to the Deputy Academic Director who will reserve the items for the staff member to collect at the end of the term/academic year.

All such gifts and hospitality, given and received in accordance with this policy, must always be openly acknowledged. The acceptance and giving of gifts and hospitality is only allowable when **all** the following criteria apply:

- The offer has been made for a proper business or charitable purpose, is consistent with reasonable custom and practice, and is not made with the intent or appearance of improperly influencing the recipient(s) or BISC
- Acceptance is consistent with the academic, professional or charitable purpose of BISC, is for the promotion of the values and reputation of BISC or aids the establishment and maintenance of academic, collaborative, professional or business relationships with partners and supporters of BISC
- The gift or hospitality offered is appropriate, and the value, whether estimated or known, appears reasonable and proportionate to the circumstances; and
- Acceptance is in accord with all applicable BISC policies and UK legislation e.g. Bribery Act 2010. <https://www.legislation.gov.uk/ukpga/2010/23/contents>

Where a recipient is in any doubt regarding whether to accept or give a gift, they should seek advice from their Line Manager.



## 2. Conflicts of Interest

BISC employees and others with responsibility for administration or management of BISC funds must not use their authority or office for personal gain and must always seek to uphold and enhance the standing of the BISC. Any personal interest which may impinge on an employee's impartiality in any matter relevant to his or her duties should be declared by the employee, in accordance with this policy. No person shall be a signatory to any BISC contract where he or she also has a material interest in the activities of the other party.

As a guide, Managers & Directors should ask themselves whether members of the public, knowing the facts of the situation, would reasonably conclude that the interest involved, might influence the approach taken to BISC business. If so, the interest would be deemed enough for a declaration of interest and entry to be made in the Register of Interests. In order to facilitate good practice and to reinforce the BISC's commitment to propriety at all times, the BISC will maintain such a Register of Interests which will record financial and other relevant interests of SMT and Managers of the BISC.

The Register asks members of staff to record interests arising in the following areas of activity:

- All directorships registered under the Companies Act in the UK, the Canada Business Corporations Act, or similar legislation in other jurisdictions, whether they are remunerated or not
- Any employment, office or profession or other employment activity apart from BISC employment
- Shareholdings in organisations that they know to have business connections with BISC
- Any Honorary posts, unremunerated
- Relevant interests held by family members in organisations that do business with BISC

It is not intended that personal, political or religious affiliations should be declared.

## 3. Declaration of Interest

SMT Members, senior staff, staff with significant financial authority and staff with access to privileged information are required to disclose material interests in the BISC register of interests, maintained by the Director of Finance & Assets. All other members of staff must disclose any interests which might be deemed to conflict with their duties with their Line Manager, for inclusion in the register.

Where such an interest constitutes a direct or indirect financial interest, the member involved should not seek to influence any decision relating to the matter concerned. Where a member of staff has an interest which is not financial, but which is relevant to the business of the BISC, that interest must be declared. Where the interest is substantial, the member involved should not seek to influence any decision on the matter in question and should withdraw from the discussions and decisions relating to that interest. Where an interest arises from membership of a public body and where there is no financial interest, full participation in the discussion and decision is allowable. (A public body is deemed as any institution or organisation wholly or significantly supported through public funds, a professional organisation or a representative group.)



## POLICY

<b>Responsibilities:</b>	
<b>Contact Officer(s):</b>	<b>Responsible for: Annual Review of policy</b>
<b>Job title</b>	Director of Finance and Assets.

<b>Date for Next Review:</b>	April 2020
<b>Related Documents:</b>	Procurement & Purchasing Policy Travel & Expenses Reimbursement Policy Anti-bribery Policy Whistleblowing Policy Acceptable Use of Credit Card Procedure Travel and Subsistence Expenses Guideline for EL Related Activities; Travel and Subsistence Expenses Procedure for EL Related Activities.
<b>Superseded by:</b>	This policy supercedes all previous policies relating to Gifts, Hospitality & Conflict of Interest.



