



UNIVERSITY INTERNAL AND EXTERNAL HOSPITALITY & GIFTS POLICY

incorporating the Anti-Bribery policy.

Effective immediately

Introduction:	<p>This document defines the policy for hospitality or gift(s) funded by and or provided to City University, where the beneficiaries include City University staff. Anti-Bribery is specifically dealt with on the last page. This policy has been developed in the light of:</p> <ul style="list-style-type: none">• Public concern about accountability for public funds in public and quasi public organisations;• Public scrutiny by funding and other government bodies of all types of expenditure in higher education; and• A desire to operate equitably, transparently and cost effectively across all areas of the University in furthering its academic and business objectives.• Protection of the University reputation for ethical behaviour, financial probity and reliability.
Objectives:	<p>The purpose of the policy is to provide information on the duties of the individuals concerned, when hospitality or gifts are appropriate, what type of hospitality or gift is acceptable by occasion type and the funding limits for each hospitality or gift type. The underlying principles are:</p> <ul style="list-style-type: none">• There should be a clear business justification for any hospitality or gift which is funded by the University or accepted by staff, which must meet the test of reasonableness: where reasonableness is defined as appropriate for a recognisable business purpose;• The hospitality or gift provided or accepted should be affordable, appropriate to the occasion and not damage the University's reputation; and• The hospitality should not contravene any other policy in place in the University. Hospitality or gift organisers should be particularly aware of the University's Health and Safety obligations.
Applies to:	<p>Council members, staff, contractors, consultants, agents, overseas agents, external examiners and any non-employee service providers engaged on University business.</p>
Safety:	<p>Any hospitality given or accepted must comply with the University safety standards. Risk assessments of activities should be ratified with the University Safety Officer.</p>
Authorisation:	<ul style="list-style-type: none">• Any hospitality must be authorised by the Budget Holder or if the Budget Holder is taking part, the Budget Holder's Line Manager. More restrictive local school or service area rules may also apply.• For any event that is to take place where the guidance / rules set out in

	<p>this document are to be exceeded, prior approval must be given by the Vice-Chancellor, Pro/Deputy Vice-Chancellor or the Chief Finance Officer (in the case of Pro/Deputy Vice-Chancellor or the Chief Finance Officer, the Vice Chancellor must approve such and in the case of the Vice Chancellor, the Chair of University Council) before any persons are invited or any commitment made to any service providers.</p>
Exclusions:	<ul style="list-style-type: none"> • Travel, which is covered by a separate policy; • Where the outgoing hospitality or gift is for marketing or PR purposes or where it is a formal University corporate event or a guest/guest speaker acting in a pro bono capacity
Applicable legislation:	<ul style="list-style-type: none"> • Prevention of Corruption Acts 1906 and 1916 • Bribery Act 2010 (OECD Anti-Bribery Convention) • Nolan Committee Report – Standards in Public Life • HMRC Tax Liability (see relevant section).
Value for Money:	<p>Any expenditure on hospitality or gifts must follow the University's purchasing procedures, see https://uss.city.ac.uk/cms/purchasing_services/dps/staff/QRG_All_Areas_GENERIC_Aug_10.pdf</p>
Unacceptable hospitality and gifts:	<ul style="list-style-type: none"> • Council members, staff, contractors, consultants, agents, overseas agents, contractors, external examiners and any non-employee service providers engaged by the University may not accept hospitality or gifts, irrespective of value, which might influence or be seen to influence the outcome of an exam, an award of business (contract) or the use of the University's Intellectual Property or other assets, or to benefit personally or for the benefit of anyone/body connected to that person. • Note acceptable hospitality/gifts may become unacceptable due to timing, such as during a tendering exercise or to an academic prior to marking papers etc. • Cash, gift certificates, weekend trips, holidays or any other high value hospitality or gifts etc may not be accepted under any circumstances - any such offers made should be brought to the attention of the Commercial Director as soon as practicable. • The taking or providing of bribes in any form is strictly forbidden.
Hospitality and gifts acceptance:	<ul style="list-style-type: none"> • Hospitality and gifts should be logged in the School or Portfolio Hospitality/Gifts register and gifts should be passed to Purchasing Services who will log and receipt the gift. Staff should retain the receipt. • Any gift retained by a member of staff with the exception of low value items (<£25), will be deemed to be of the same status as a bribe retained (see section on Applicable Legislation). • Staff, especially those who previously worked in the private sector, should note that different legislation (Prevention of Corruption Act – breach of which can carry a custodial sentence) applies to gifts received in this sector which does not apply in the same way to gifts received by staff in private businesses. See the Anti-Bribery section below. • Occasional business lunches or hospitality and invitations to outside events may be accepted when appropriate but should be logged in the appropriate Hospitality/Gifts register. • Offers of extended hospitality (eg hospitality at a sports event) from a vendor or potential vendor should be referred to the Director of Purchasing or the Director of Internal Audit (or the Commercial Director in

	<p>their absence) BEFORE it is accepted.</p> <p>An up-to-date hospitality register must be maintained within each functional area. This should be reviewed every three to six months by the Senior Manager of each of these areas and evidenced as such – this will also be reviewed from time to time by Purchasing Services and / or Internal Audit and should be available without notice being required. Any hospitality received by the Senior Manager should be recorded in his or her own Hospitality Book and reviewed by the Vice-Chancellor or their designate annually.</p>
Conduct and behaviour:	Staff shall conduct themselves in a professional manner whether being entertained or entertaining on the University's behalf.
Occasions which may merit University provided hospitality/gift:	<ul style="list-style-type: none"> • Festive celebrations such as Christmas, Diwali, Eid, Hogmanay, Thanksgiving etc. NOTE: OCCASIONS ARE LIMITED TO ATTENDANCE AT ONE ANNUALLY. • Learning Event to aid the forming of a new team / department/boost morale. • Leaving parties for staff who have worked for City for more than 3 years • Retirement of staff who have worked for City for more than 5 years • Long service gift/hospitality on the occasion of ten and twenty years of service • Where significantly higher levels of contribution than normal have been given by a group / team and recognition of this is appropriate. • Hospitality provided to external parties for sales / marketing / development purposes • Business meals provided to external parties
Staff meals/coffee:	When staff meet together to discuss business either internally or externally meals or drinks may not be claimed as expenses.
Internal hospitality for meetings:	Internal hospitality such as lunch or refreshments etc should not be arranged for meetings of less than two hours. When arranged it should be used sparingly and approved by the Head of Department in the School or Service Support.
Venues for hospitality:	The University Marketplace https://uss.city.ac.uk/cms/purchasing_services/staff/marketplace.html has a list of vendors which may be used for hospitality in the vicinity of the University (on production of an ID Card) many will offer a discount: agree this at the time of reservation.
How to book:	Reservations are subject to the normal ordering and authorisation process. When this option is unavailable the most senior staff member in attendance should settle the bill and the cost should be claimed through the expense process. A framework order may not be used.
Tax Liability:	The University pays the tax liability on any hospitality (except Xmas functions/annual parties that don't exceed the aggregate IR allowable limit of £150 per head) where there is a ratio of greater than 2:1 staff to non staff. This is done through a PAYE Settlement Agreement (PSA). For example if there were 3 staff to 1 non, then City would pay the liability on one of the meals i.e 25% of the bill. This means that such expenditure will cost budgets significantly more than the billed cost of the hospitality. Further information on this is available if required from the Payroll Office within Finance.

Cancellations:	Cancellations should be made without delay and any credits or refunds must be returned to the University. Failure to observe this rule may result in the University's Disciplinary Procedure being enacted.
Related Policies and Procedures	<ul style="list-style-type: none"> • Certain aspects of this policy are impacted by rules and legislation that are contained in the University's Purchasing Manual and in University Financial Regulations http://www.city.ac.uk/finance/finregs.html staff arranging and / or approving hospitality must be aware of the contents of these documents. • All staff making expense claims must be aware of the procedure and rules relating to expense claims, including payment of advances on expenses, as given in 'Reimbursement of expenses incurred by staff' of the Finance intranet site. http://www.city.ac.uk/finance/staff/index.html • The forms to be used for expense claims and requests for advances are available via the Payroll forms page on the Finance web site: https://uss.city.ac.uk/cms/fin_city_staff_only/payroll/payrollforms.html#expenses ; • The University recognises that hospitality or reciprocation of it can be a vital part of doing business effectively. However, the abuse of expenses is very serious and the University will take appropriate disciplinary action where it uncovers such abuse.

Permissible Internal Hospitality: until 31st July, 2011

Function Type	Maximum University Funding***	Notes
Festive Celebration	£40 per person**	One per functional area of the University (ie a member of staff can only belong to one functional area) per year. Guests can be invited from other areas of City or externally but their invitation must be justifiable and must be funded in full by the Host's cost centre.
Leaving Drinks for staff who have worked for City for less than 3 years	Zero	
Leaving Drinks for staff who have worked for City for 3-5 years	Max of £200 total	With a maximum limit of £15 per <u>confirmed</u> attendee.
Leaving Drinks for staff who have worked for City for more than 5 years	Max of £500 total	With a maximum limit of £15 per <u>confirmed</u> attendee.
Retirement for staff who have worked for City for less than 10 years (but more than 5 – zero for less than 5 years service)	Max of £500 total	Person retiring can choose to spend the £500 on a meal or alternative event for a reduced number of people or a drinks party for a larger amount.
Retirement for staff who have worked for City for more than 10 years	Max of £1000 plus gift allowance of £200	Person retiring can choose to spend the £1000 on a meal or alternative event for a reduced number of people or a drinks party for a larger amount. Gift allowance to be used as thought appropriate by relevant line management.
Event to aid the forming of a new team / department or moral boosting event where it has been identified that this area is a major issue.	Max of £40 per person**	Justification for such events may be challenged by Internal Audit or other relevant management.
Where significantly higher levels of contribution than normal are expected or have been given by a group / team and recognition of this is required.	Not normally to exceed £50 per person** - Maximum of £500 total.	Justification for such events may be challenged by Internal Audit or other relevant management. Can include external parties if a joint initiative.
Business Meals with other external parties (excluding formal university events and events for marketing / PR purposes).	Breakfast: £10 Lunch: £15 Dinner: £27.50	Rates per person attending. Justification for such events may be challenged by Internal Audit or other relevant management.

Permissible Internal Hospitality: from 1st August, 2011

Function Type	Maximum Funding***	Notes
Festive Celebration	£40 per person*/**	One per year per functional area of the University (ie a member of staff can only belong to one functional area). Guests can be invited from other areas of City or externally but their invitation must be justifiable and must be funded in full by the Host's cost centre.
Retirement/Leaving Drinks for staff who have worked for City for less than 3 years	Zero	
Leaving Drinks for staff who have worked for City for more than 3 years	Max of £200 total	With a maximum limit of £15 per <u>confirmed</u> attendee.
Retirement for staff who have worked for City for between 3 and 10 years.	Max of £200 total	Person retiring can choose to spend the £200 on a meal or alternative event for a reduced number of people or a drinks party for a larger amount.
Retirement for staff who have worked for City for more than 10 years	Max of £500 plus gift allowance of £200	Person retiring can choose to spend the £500 on a meal or alternative event for a reduced number of people or a drinks party for a larger amount. Gift allowance to be used as thought appropriate by relevant line management.
Long service hospitality/gift 10 yrs	Max of £200	Staff may choose a gift or hospitality or a combination of both.
Long service hospitality/gift 20 yrs	Max of £500	Staff may choose a gift or hospitality or a combination of both.
Where significantly higher levels of contribution than normal are expected or have been given by a group / team and recognition of this can be justified.	Max of £40 per person** - Maximum of £500 total.	Justification submitted for approval to the COO of the School or the CFO in the case of Central Services.
Business Meals with other external parties (excluding formal university events and events for marketing / PR purposes).	Breakfast: £10 Lunch:£15 Dinner: £27.50	Rates per person attending. Justification for such events may be challenged by Internal Audit or other relevant management.

* = Areas of the University may wish attendees from their areas (but not invited guests) to make a contribution to the overall cost for seasonal and team celebrations. ** = For these events, Inland Revenue rules allow up to £150 of hospitality per named employee per year. Anything above that will mean the employee will have to declare the taxable benefit on their annual tax return.

*** = Additional funds sourced from funds not held by the University can be used to top-up these limits.



**CITY UNIVERSITY
LONDON**

ANTI-BRIBERY

Introduction	The City University values its reputation for ethical behaviour and financial probity and reliability. The University recognises that any involvement in bribery will reflect on its image and reputation.
Objective	To limit exposure to bribery by making all applicable aware of the University position on bribery, setting out a clear policy, to support training to recognise and avoid bribery of selves and others, and encourage vigilance by all concerned.
The Policy	<p>The City University absolutely prohibits the offering, giving, soliciting or the accepting of any bribe in whatever form to or from any person or company, public or private by any council member, staff, contractors, consultants, agents, overseas agents, external examiners and any non-employee service providers engaged on University business for whatever reason.</p> <p>Any act of bribery will receive zero tolerance.</p>
Responsibility	<p>The prevention, detection and reporting of bribery is the responsibility of all staff.</p> <p>To this end staff should be aware of the Public Interest Disclosure process at: http://www.city.ac.uk/hr/policies/professional-conduct/public-interest.html</p>