



## Anti-Bribery Policy including Gifts & Hospitality Guidance

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1. Staff must declare all offers of gifts and hospitality, made to or by you, with a value of £40 or more (gifts and hospitality of a lesser value may be declared if the staff member considers this is appropriate). All such offers must be declared whether accepted or declined. Offers of gifts and hospitality may include items ranging from diaries, wall charts, and boxes of chocolates, to lunches to free international travel and accommodation.
2. Declarations must be recorded in the Gifts and Hospitality Register (the register). The register is available online to complete [The Declaration of Hospitality/Gifts Form](#). It is maintained by the Secretary and Director of Resources & Planning and Finance Office, and is available on request.
3. It is your responsibility to ensure that you are not placed in a position that risks, or appears to risk, compromising your role or public and statutory duties. You should not be seen to be securing valuable gifts and hospitality by virtue of your job. You should not accept or provide any gift or hospitality if acceptance/provision will give the impression that you have been influenced/are deemed to be influencing while acting in an “official capacity”.
4. This guidance also applies to spouses, partners or other associates if it can be argued or perceived that the gift or hospitality is in fact for the benefit of the staff member.
5. In exercising judgement as to whether to accept a gift or hospitality the question should be asked what public perception would be if the information was published given your role and circumstances.

### Receiving Gifts

6. You may retain all gifts valued at £40.00 or under (or the equivalent total value of £40.00 or under in the case of receiving several smaller value gifts from a single source in a calendar year).
7. For gifts exceeding a value of £40.00 the following options are suggested:
  - share the gift with all staff
  - raffle the gift for charity
  - donate the gift to charity

or



- return the gift, but if refusal could be considered offensive, acceptance of the gift must be approved by the Secretary & Director of Resources & Planning.

### **Accepting Offers of Hospitality – Genuine Business Reasons**

8. Hospitality offered should only be accepted where there is a direct link to working arrangements and a genuine business reason can be demonstrated, for example:

- attendance or speaking at a conference, which provides complimentary subsistence, travel and accommodation (this does not need to be declared on the register except where a gift was received, see above)
- attending at a free training course; or
- attending a drinks reception to network

9. It is recognised that, in the course of carrying out your duties, you will need on occasion to ensure good relationships with existing and future partners and stakeholders and that this may involve for example, the receipt of modest working lunches and dinners. These are acceptable where there is a genuine business reason.

10. Hospitality invitations to events which are purely social events should be considered very carefully before accepting; in such circumstances it may be much more difficult to substantiate a genuine business reason. If the staff member pays the full cost and takes holiday to attend, then this should be permitted but only if recorded in the register and properly approved. These invitations should be recorded in the register whether received or declined. You may not accept free holidays from a current or potential contractor or partner. Invitations such as these should be declined and **MUST** be recorded in the register.

### **Gifts and Hospitality Offered by LSHTM**

11. Staff must be mindful that the value of all gifts and hospitality offered by LSHTM are sourced from public funding, and the expectation is that such funding will be used for legitimate purposes and demonstrate value for money.

12. In exceptional circumstances it may be appropriate for LSHTM to provide a gift of up to £40.00 in value, for example:

- providing a bouquet of flowers to a seriously ill employee, or to a longstanding employee who is retiring
- giving book tokens to someone who spoke at a conference free of charge

13. It is acceptable to provide modest hospitality in the way of working lunches and/or dinners to existing and potential partners and stakeholders subject to a genuine business reason.



### **Declaration**

14. You should make your declaration prior to the receipt of the gift or hospitality where possible, or as soon as possible after the offer or receipt of gifts or hospitality (no later than 10 working days). All declarations will go to the manager you identify in the register for review.

15. You should consult the Secretary & Director of Resources & Planning or Finance Office for any further guidance required. In general terms, if you have any doubt about whether an item should or should not be declared, you are advised to declare it.

### **Monitoring**

16. The register is an annual document and will be maintained on a financial year basis and will be reviewed by Audit Committee on an annual basis. It will be kept under review by the Secretary & Director of Resources & Planning and Finance Office with a minimum of monthly reviews.

17. Staff will be reminded periodically of their requirement to declare gifts and hospitality provided/accepted/declined in accordance with this guidance.