

Policy and Procedure for Gifts and Hospitality

A. Background

1. The whole LSE community, including all staff, students, and members of Council, are expected to act to the highest standards of ethical integrity in accordance with the ethical principles set out in the School's Ethics Code.
2. This policy and procedure aim to ensure:
 - there is no improper conduct;
 - that gifts and hospitality do not influence, or appear to influence, decisions, judgements and integrity;
 - that potential risk and reputation are considered in the acceptance of gifts and hospitality;
 - acceptance of gifts and hospitality is open and transparent;
 - appropriate approval is gained and
 - best practice regarding anti-bribery and corruption practices and to provide auditable record.
3. This policy and procedure applies to all LSE staff and associated representatives, irrespective of country of employment, and applies to activity anywhere in the world. Failure to comply with this procedure may constitute misconduct and may result in disciplinary action being taken by the School.
4. Gifts are defined as tangible items which may range from low to high value. Typical gifts received include corporate merchandise, stationary, flowers and confectionary. Hospitality is defined as entertainment related arrangements which also range from low to high value. Typical hospitality includes food and drink such as a working lunches, dinners, accommodation or tickets to cultural and sporting events.
5. Gifts and hospitality offered to individual staff, whether accepted or not, in the course of their work for the School are a form of income and should be reported. They may sometimes also be offered to those associated with staff, including family and relations and such gifts and hospitality should also be reported. Records should be kept for audit purposes which may be provided to third parties in the case of relevant requests under the Freedom

of Information Act 2000.

6. This policy and procedure supports the School's [Policy Against Fraud and Bribery](#).
7. Charitable and philanthropic donations received by the School are subject to separate procedures.

B. Accepting Gifts and Hospitality

8. Gifts and hospitality are sometimes offered to LSE staff in the course of carrying out their official duties and in order to promote good working relationships but should only be accepted if the staff member to whom the offer is made is satisfied that:
 - The offer has been made for a proper purpose associated with official School business;
 - Acceptance is consistent with the ethical framework in which the School operates, as detailed in the [Ethics Code](#);
 - The offer is appropriate and its value is reasonable and proportionate to the circumstances;
 - Acceptance accords with all applicable School policies and governmental legislation;
 - Acceptance does not constitute an actual or perceived conflict of interest;
 - Acceptance does not create a specific or general obligation which the School is required to fulfil; and
 - Acceptance does not constitute an actual or perceived inducement in respect of a decision the individual or School is responsible for, including academic assessment.
9. If acceptance creates an actual or perceived conflict of interest in respect of a decision the School must make, whether immediately or sometime after acceptance, the person should absent themselves from the decision-making process. Further details can be found in the Conflicts of Interest Policy.
10. A non-exhaustive list of parties offering gifts and hospitality includes:
 - suppliers or their agents, current or potential, direct and subcontractors;
 - students (including current, prospective and former), and their relatives;
 - other universities or third-party organisations;
 - potential or current employees, donors or their relatives.
11. No money or monetary token of any value should be accepted, this includes cash or equivalent vouchers, credit or personal discounts. If you are offered money you should immediately inform your line manager and the Ethics Manager and record the refusal on the [register](#).
12. Offers of hospitality that appear to exceed the norm or convention within LSE and the HE sector should be considered especially carefully before a decision is made to accept them or not. Where in doubt, staff should seek advice from the Ethics Manager. They should also consult the School's Policy and Procedures against Fraud and Bribery.

13. Any high value gifts and hospitality should be politely declined (or returned) where possible with the explanation that School policy does not allow acceptance. The supporting decision making guide includes guidance on acceptable and unacceptable gifts and hospitality.
14. Gifts and hospitality that meet the above standards may be accepted with the following approval thresholds:

Gift and hospitality approval thresholds		
Estimated value	Approver	Recording
Up to £49.99	Self-approval	No recording required/voluntary
Between £50.00 and £99.99	Self-approval	Record whether accepted or declined on the online Gift and Hospitality Register
Between £100.00 and £249.99	Line manager approval or School Secretary for Members of Council	
Over £250.00 or which seem unusual	Chief Financial Officer	Record the offer on the online Gift and Hospitality Register to request CFO approval

15. Where hospitality offered is directly related to delivering teaching or research (conducting research, disseminating or communicating academic research) higher approval thresholds are in place, e.g. for travel to academic conferences, where the offer meets all other conditions of this policy (including those outlined in paragraph 8), line manager approval and recording on the register will not apply unless the value exceeds £250.

Gift and Hospitality approval thresholds – teaching and research		
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Up to £49.99	Self-approval	No recording required/voluntary
Between £50.00 and £249.99	Self-approval	Record whether accepted or declined on the online Gift and Hospitality Register
Between £250.00 and £499.99	Line manager approval	
Over £500.00 or which seem unusual	Chief Financial Officer	Record the offer on the online Gift and Hospitality Register to request CFO approval

16. Where possible staff should seek to obtain approval prior to accepting gift and hospitality. Where it is not possible to do so in advance, retrospective approval shall be sought.

17. Where there are any concerns or reservations, or the gift or hospitality seems unusual, approval should be sought from the Chief Financial Officer. Issues that cannot be resolved may be referred to the Ethics Management Board for consideration
18. Acceptance of gifts or hospitality with a known or estimated value below £50 need not be declared or recorded, unless:
 - i. they amount cumulatively over time to more than £50, in which case they should be approved and recorded as outlined in this procedure; or
 - ii. they occur with a frequency of more than once a year, in which case they should be approved and recorded as outlined in this procedure; or
 - iii. the intended recipient chooses to do so if they feel it appropriate and/or they are more comfortable doing so than not.
19. It is expressly prohibited for a member of staff to accept gifts or hospitality from an organisation that they know to be actively involved in a procurement process with the School, except where hospitality is provided as part of a fact-finding visit or meeting. If an individual accepts hospitality which could be construed as giving them a conflict of interest in respect of procurement or other decision that they make in the course of their work, they should declare it so that the conflict can be appropriately managed.
20. Gifts from students may be perceived to be provided in order to influence assessment decisions. Therefore, only low value thank you gifts should be accepted.

C. Offering Gifts and Hospitality

21. Gifts and Hospitality may only be provided by staff to support professional and business relationships and to promote the School where:
 - The offer is made for a proper purpose associated with official School business;
 - The offer is appropriate and its value is reasonable and proportionate to the circumstances;
 - The offer is consistent with the ethical framework in which the School operates, as detailed in the [Ethics Code](#);
 - The offer accords with all applicable School policies and governmental legislation. Gifts and hospitality should not be offered to public officials as they may be construed as a facilitation payment which is illegal under fraud and bribery legislation;
 - The offer is not made to influence or be perceived to influence an individual or organisation or to gain any advantage;
 - The offer made does not constitute an actual or perceived conflict of interest.

D. Reporting and record-keeping

22. The Secretary's Division will maintain a School wide [online register of gifts and hospitality](#). The Ethics Manager will report on this annually to the Ethics Management Board. Registers will be kept for six years beyond the end of the

financial year to which they relate.

23. Each department, division or unit should promote to their staff the requirements of this policy and how to declare any gifts and hospitality offered or received.
24. Each member of staff who is offered and/or accepts gifts or hospitality will be responsible for recording this on the School's register.
25. Declarations of gifts and hospitality should include the following:
 - Name of the member of staff and their department, division or unit
 - A description of the gift or hospitality
 - The reason for the offer
 - The value of the gift or hospitality
 - The provider/giver's name and organisation
 - The nature of the business relationship
 - Date/s of the offer and receipt
 - Whether the gift or hospitality was accepted
 - What has been done with any gifts received

E. Further Information

26. Further guidance and information may be sought from the Ethics Manager by emailing ethics@lse.ac.uk.

Review schedule

Review interval	Next review due by	Next review start
3 years	May 2024	Lent Term 2024

Version history

Version	Date	Approved by	Notes
1.0	Dec 2014	Governance Legal and Policy Division	
1.1	Dec 2016	Governance Legal and Policy Division	Minor updates to named officers
1.2	Jan 2019	Secretary's Division	
2.0	May 2021	Ethics Management Board	Changes to thresholds in reporting and approvals; changes to the record keeping responsibilities.

Links
Online Gift and Hospitality Register
Gift and Hospitality FAQs - See Ethics webpages
Gift and Hospitality Decision Making Guide - See Ethics webpages
The Ethics Code
Financial Regulations
Policy against Bribery and Fraud
Conflict of Interests Policy
Travel, Subsistence and Personal Expenses Policy and Procedure
Whistleblowing Policy
Procurement Policy
For external paid work: Terms and Conditions

Contacts

Position	Name	Email	Notes
Ethics Manager	Stephanie Allison	s.allison@lse.ac.uk	

Communications and Training

Will this document be publicised through Internal Communications?	Yes
Will training needs arise from this policy	Yes
To be incorporated in all staff inductions	