Gifts and Hospitality Policy

Version 2.0

Approved by the Board of Governors

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This policy forms part of LSST's integrated framework for reporting, investigating, and managing serious concerns. All disclosures are handled in accordance with the Whistleblowing Policy, which provides a single reporting structure and consistent protections.

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1. PURPOSE

1.1. London School of Science and Technology's (LSST) Gifts and Hospitality Policy provides guidance as to circumstances when it is and is not appropriate to accept gifts, gratuities and hospitality. It is also designed to provide protection for staff members and the organisation on those occasions when a gift has been accepted by recording such gifts and the reasons for acceptance in an accountable and transparent way.

1.2. This Policy applies to all LSST staff, governors, contractors, agents, and students, where they are acting in connection with LSST activities or representing the School in any capacity.

1.3. Students must comply with this Policy where gifts or hospitality are offered to them, provided by them, or exchanged in circumstances connected with their studies, assessment, admissions, placements, or any other LSST-related activity.

2. LEGAL BASIS

2.1. The Bribery Act 2010 ("the Act") came into force on 1 July 2011, replacing and consolidating earlier anti-corruption legislation dating from 1889, 1906 and 1916. The Act applies to all offences committed on or after that date.

2.2. The Act addresses bribery in both the public and private sectors. In broad terms, bribery involves offering, promising, giving, requesting, agreeing to receive, or accepting a financial or other advantage with the intention of inducing or rewarding the improper performance of a function or activity.

2.3. Of particular relevance to LSST is Section 7 of the Act, which creates a specific offence for organisations that fail to prevent bribery by persons associated with them, including employees, agents, contractors, or other representatives acting on their behalf.

2.4. For offences committed prior to 1 July 2011 (subject to statutory limitation periods), the following legislation may apply:

- Prevention of Corruption Acts 1906 and 1916 (repealed).
- Public Bodies Corrupt Practices Act 1889 (repealed).
- Common law offences relating to bribery and the acceptance of bribes.

2.5. This Policy should be read in conjunction with LSST's Anti-Bribery Policy and Anti-Fraud Policy, which set out the institution's zero-tolerance approach to bribery, fraud, corruption, and financial misconduct, as well as the procedures for reporting concerns and suspected breaches.

3. DEFINITIONS

3.1. Gift

3.1.1. A gift is any financial, material, or personal benefit offered or received without charge or at a preferential rate, which may result in personal advantage to the recipient. Gifts include, but are not limited to:

- Cash or cash equivalents (e.g. vouchers, gift cards).
- Goods, merchandise, or items of value.
- Discounts or preferential pricing not generally available to the public.
- Services provided free of charge or at reduced cost.
- Loans, hospitality, or benefits provided to family members or associates.

3.1.2. For the avoidance of doubt, cash and cash-equivalent gifts are prohibited in all circumstances.

3.2. Hospitality

3.2.1. Hospitality refers to the provision or acceptance of entertainment, accommodation, meals, travel, or attendance at events, whether provided free of charge or at a preferential rate, in connection with LSST business or professional activities. Hospitality may include:

- Meals, refreshments, or working lunches.
- Attendance at conferences, exhibitions, or professional events.
- Tickets to sporting, cultural, or social events.
- Travel, accommodation, or associated expenses.

3.2.2. Hospitality is only permissible where it is:

- Reasonable, proportionate, and transparent.
- Clearly connected to a legitimate institutional purpose.

4. REPORTING AND REGISTER

4.1. A declaration must be completed and recorded in the LSST Register of Gifts and Hospitality for:

- Any single gift or hospitality with an estimated value over £50.
- Any cumulative gifts or hospitality from the same source exceeding £100 within a rolling 12-month period.
- All refused offers, regardless of value, where refusal was due to policy considerations.
- Gifts or hospitality provided by LSST to external parties.

4.2. Declaration requirements apply regardless of whether prior authorisation was required or obtained, and regardless of whether the gift or hospitality was accepted or declined – please refer to Anti-Bribery Policy (9.3).

4.3. Each staff of LSST is personally responsible for reporting full information concerning any matters that fall within the scope of this policy.

4.4. The declaration forms can be found here:

- LSST Gifts Declaration Form – Fill out form
- LSST Hospitality Declaration Form – Fill out form

4.5. Gifts or hospitality must be declared as soon as practicable and no later than 10 working days after receipt, offer, or refusal.

4.6. The Register of Gifts and Hospitality provides a formal, transparent record of all gifts and hospitality offered, accepted, refused, or provided by LSST staff and representatives in the course of their duties.

4.7. The LSST Register of Gifts and Hospitality is owned by the Finance Office, which retains overall accountability for the integrity, completeness, and appropriate use of the Register.

4.8. The Register is maintained by the Quality Unit on behalf of the School, including the day-to-day administration, recording, and monitoring of declarations submitted under this Policy.

4.9. The Quality Unit will maintain a Register of Gifts and Hospitality, which will be confidential, safe in respect of information which the School is required to make public in compliance with applicable legislation or regulation.

4.10. The Register supports:

- Compliance with the Bribery Act 2010.
- Institutional integrity and transparency.
- Effective risk management and audit assurance.

- Protection of staff from allegations of impropriety.

4.11. The Register of Gifts and Hospitality is maintained centrally on behalf of LSST and is subject to oversight by senior management, the Audit Committee, and the Board of Governors.

4.12. Information about the interests of members of the School will be held on the Register of Gifts and Hospitality for the term of an individual's employment, consultancy or association with the School and for a period of seven (7) years following the termination of that relationship.

4.13. Senior management and Deans of Campuses (and those involved in regulatory processes, such as the Head of Operations) will also be permitted to inspect the Register of Gifts and Hospitality to assist with the management of any conflicts of interest within their specific areas.

5. RESPONSIBILITIES

5.1. All staff, governors, contractors, and representatives of LSST are responsible for:

- Complying with this Policy.
- Exercising sound judgement and integrity.
- Declaring gifts and hospitality accurately and promptly.
- Declining offers that could give rise to actual or perceived conflicts of interest.

5.2. Line Managers are responsible for:

- Ensuring staff awareness of this Policy.
- Reviewing and approving register entries.
- Challenging or escalating inappropriate offers.

5.3. Senior Leadership and Board of Governors:

- Academic and regulatory risks (including those relating to OfS Conditions B and C) are monitored by the Academic Board, supported by the Academic Standards and Quality Enhancement Committee.
- Operational, financial, and reputational risks are reviewed through the Executive Committee and Finance Committee.

6. PROHIBITED GIFTS AND HOSPITALITY

6.1. The following must never be accepted or offered:

- Cash or cash-equivalent gifts.
- Gifts or hospitality intended to influence procurement, admissions, assessment, validation, accreditation, or regulatory outcomes.
- Gifts or hospitality offered during live procurement, tendering, or contract renewal processes.
- Gifts or hospitality that could reasonably be perceived as excessive, lavish, or inappropriate.

6.2. Where refusal would cause offence (e.g. cultural reasons), the gift should be accepted on behalf of LSST and reported immediately, with a decision taken on appropriate institutional use or disposal.

7. BREACHES OF POLICY

7.1. Failure to comply with this Policy may result in:

- Disciplinary action under LSST's disciplinary procedures.
- Withdrawal of delegated authority.
- Referral to external authorities where criminal conduct is suspected.

7.2. Where a breach of this Policy involves a student, the matter may also be addressed under LSST's Student Disciplinary or Academic Integrity procedures, as appropriate.

7.3. Any concerns regarding suspected bribery, corruption, or improper conduct must be reported in line with LSST's Anti-Bribery Policy, Anti-Fraud Policy, or Whistleblowing Policy.

8. REPORTING CONCERNS

8.1. Initial queries or requests for guidance on matters relating to gifts and hospitality should be addressed in the first instance to Campus Dean and/or Line Manager.

8.2. Any concerns relating to gifts or hospitality, including suspected bribery, conflicts of interest, or improper influence, must be reported under LSST's Whistleblowing Policy.

8.3. Concerns should be reported via whistleblowing@lsst.ac, or to a Designated Officer or the CEO.

8.4. Concerns may be raised anonymously and will be handled in accordance with the Whistleblowing Policy's procedures and protections.

VERSION HISTORY

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