

## Register of interests and Bribery Act declaration: explanatory notes for staff and Governors

These notes accompany the annual Register of Interests and Bribery Act declaration which Governors, co-opted committee members and some University staff are asked to complete.

### 1. Declaration of interests

An **interest**, for the purpose of the Register of Interests, is defined as follows:

- (i) Any significant shareholding or material interest in a business which may supply or trade with the University of Greenwich. Business relationships that might be relevant include consultancy, employment, directorships, partnerships, shareholdings, memberships or the trusteeships of charities;
- (ii) Any matter which may reasonably be deemed by others to encroach on impartiality;
- (iii) Any personal, financial or other beneficial interest an individual, including a connected person, may have in any financial arrangements with the University of Greenwich.

In making your declaration, you should include your **connected persons** as well as yourself. The University's [Articles of Association](#) define a 'connected person' as:

- 1. Your child, parent, grandchild, grandparent, brother or sister;
- 2. The spouse or civil partner of you or any person falling within 1 above;
- 3. A person carrying on business in partnership with you or with any person falling within 1 and 2 above;
- 4. An institution which is controlled:
  - a. By you or any connected person falling within 1-3 above; or
  - b. By two or more persons falling within 4a when taken together;
- 5. A body corporate in which:
  - a. You or any connected person falling within 1-3 above has a substantial interest; or
  - b. Two or more persons falling within 5a who, when taken together, have a substantial interest.

If there is any possibility of a conflict of interest relating to you, your connected persons or close business associates, please include relevant information.

### 2. Declarations of hospitality/gifts

In accordance with the University's [Financial Regulations](#), members of staff and Governors may not accept any gifts, rewards or hospitality (or have them given to members of their families) from any organisation or individual with whom they have contact in the course of their work or service as a Governor that would cause them to reach a position whereby they might be, or might be deemed by others to have been, influenced in making a business decision as a consequence of accepting such hospitality.

Members of staff and Governors may accept normal courtesy hospitality (such as business lunches or attendance in an official capacity at a public function) and low-value promotional gifts. Care must always be taken to ensure that whenever such hospitality or gifts are accepted, no obligation to the person or organisation offering the hospitality or gifts is created. If in doubt, please consult the University Secretary or Chief Financial Officer.

The following types of hospitality/gifts must be declared:

- Attendance as a non-paying guest of a commercial organisation or individual at a non-work related cultural or sporting event;
- The acceptance of any gift valued in excess of £50, including multiple individual gifts from the same source whose total value is more than £50.

Staff are required to obtain approval from their line manager before accepting gifts in these categories. Governors should only declare gifts which relate to their role as a Governor.

### **3. Bribery Act**

The following are example criteria to test if gifts, hospitality or reimbursed expenses comply with anti-bribery legislation:

*Made for the right reason:* if a gift or hospitality, it should be given clearly as an act of appreciation; if travel expenses then for a bona fide business purpose, eg provision of airport transfers, dining or tickets to an event to facilitate a client meeting.

*No obligation:* the gift, hospitality or reimbursement or expense should not place the recipient under any obligation.

*No expectations:* expectations are not created in the giver or an associate of the giver or have a higher importance attached to it by the giver than the recipient would place on such a transaction.

*Made openly:* if made secretly and undocumented, then the purpose will be open to question.

*Accords with stakeholder perception:* the transaction would not be viewed unfavourably by stakeholders if it were to be made known to them.

*Reasonable value:* the size of the gift is small (£50) and the value of the hospitality or reimbursed expense accords with general business practice.

*Appropriate:* the nature of the gift, hospitality or reimbursed expense is appropriate to the relationship and accords with general business practice.

*Legality:* it is compliant with relevant laws.

*Conforms to the recipient's rules:* the gift, hospitality or reimbursements of expenses meets the rules or Staff Code of Conduct of the recipient's organisation.

*Infrequent:* the giving or receiving of gifts and hospitality is not overly frequent between the giver and the recipient.

*Documented:* the expense is fully documented including purpose and approvals given and properly recorded in the financial accounts.

*Reported:* the gift, hospitality or expense is recorded and reported to management.

Sample tokens of low value bearing the name or insignia of the organisation giving them (for example, pens, diaries or calendars) whether given personally, or received in the post, may be retained unless they could be regarded as an inducement or reward.

Further details of the University's measures to prevent bribery are provided in the [Anti-Bribery Policy](#).