



**Dublin City University**  
**Ollscoil Chathair Bhaile Átha Cliath**

**Gifts, Entertainment and Sponsorship Regulations**  
**Revision March 2012**

## **1.0 Introduction**

Section 5 (1) (ii) and (iii) of the Dublin City University Code of Conduct for Employees deals with the subjects of gifts and hospitality respectively. The relevant sections from the code are attached at Appendix 1. The objective of these regulations is to give further guidance on these matters.

## **2.0 Definition**

- 2.1 A gift is broadly defined as anything that is given to employees for which the recipient employee does not pay fair market value, either as a result of a relationship with a particular party or because the employee is a public figure.
- 2.2 Gifts offered by personnel of different organisations vary widely and may include material goods, services, promotional premiums, travel and accommodation for business or vacation purposes, tickets to sporting or cultural events and on-going discounts not generally or readily available to the public at large.

## **3.0 Receiving Gifts**

- 3.1 Employees are responsible for ensuring that they maintain the highest standards when involved in dealings with outside individuals, agencies or companies. As such, employees and/or their family members should never solicit or accept personal advantages or gifts of material value from firms or persons and which gifts or advantages arise directly or indirectly as a result of the employee's association with Dublin City University.
- 3.2 Business gifts may be accepted by employees as courtesies where such are designed to build understanding and goodwill among business partners. In this context, during the traditional gift giving seasons, gifts of modest value may also be accepted, where refusal to accept might give offence.
- 3.3 When an employee is a guest in another country and if the gift is being offered as part of a public occasion it is best to accept the gift on behalf of the organisation. In such situations, the employee should report the gift to his/her department head and give it to the University if requested to do so.
- 3.4 Employees can accept promotional items of limited value, such as inexpensive pens, calendars, mugs etc. that bear a company's name. Employees of Dublin City University can also present gifts such as these to other business partners.
- 3.5 Employees must not accept cash, gift cheques or any vouchers that may be exchanged for cash regardless of the amount from external individuals or organisations.
- 3.6 The value of gifts accepted in any year from any one source must not exceed €200. All employees are expected to disclose fully all individual gifts with a value exceeding €100 to their appropriate department head within Dublin City University.

- 3.7 A gift which exceeds these criteria should be returned with a polite explanation stating that acceptance of the gift is not permitted under the Dublin City University Code of Business Conduct. Details of returned gifts must be notified to your line manager.
- 3.8 Employees who are in doubt about the appropriateness of accepting a gift should first consult with their line manager.

#### **4.0 Giving Gifts**

- 4.1 Employees should not give any money or any gift to any director, executive, official or employee of any supplier, customer or any other organisation if doing so would influence or could reasonably give the appearance of improperly influencing the organisation's relationship with Dublin City University.
- 4.2 Employees may provide a gift of a nominal value once it falls within the parameters set out in this Code in relation to receiving gifts and the same financial and practical guidelines apply.

#### **5.0 Receiving Business Entertainment**

- 5.1 Entertainment of employees by suppliers or customers is acceptable within normal commercial criteria where such are designed to build understanding and goodwill among business partners. However, business entertainment must be moderately scaled and clearly intended to facilitate business goals. This criteria is defined as follows:
- Business entertainment in the form of meals and beverages at a local venue is acceptable as long as it is modest and infrequent;
  - A ticket for a sports event (such as football, golf, racing, etc.) or other public entertainment at a local venue may be accepted;
  - Attendance at such events should be regarded with discretion and not become habitual;
  - The number of people representing Dublin City University at such events should be kept to a minimum and such representatives should always behave in an appropriate manner;
  - Identification in a public way by Dublin City University employees with a particular supplier/vendor should be avoided;
  - Endorsement of a particular supplier's design/product, to the exclusion of others, should be avoided, except where this accords fully with Dublin City University policy;
  - Under no circumstances may cash or cash vouchers be accepted by any employee;
  - Entertainment should, as far as possible, be on an equivalent and reciprocal basis;
  - Overnight accommodation and foreign trips are not considered routine and in normal circumstances such offers should be turned down.

- 5.2 An offer of entertainment which exceeds the criteria should be declined with a polite explanation stating that acceptance of the offer is not permitted under the Dublin City University Code of Business Conduct.

## **6.0 Dublin City University Business Entertainment**

- 6.1 Entertainment by employees of customers, suppliers and other parties is acceptable within normal commercial criteria where such are designed to build understanding and goodwill among business partners. However, Dublin City University entertainment must be moderately scaled and clearly intended to facilitate university goals. The criteria outlined above in relation to receiving business entertainment apply equally to business entertainment provided by Dublin City University.

## **7.0 General Guidelines**

- 7.1 It is the responsibility of each employee to ensure that Dublin City University's image is not damaged in any way by the acceptance of gifts or entertainment which could compromise, or be perceived to compromise, his/her position or Dublin City University itself.
- 7.2 In all instances, employees should remember that Dublin City University is a high profile public organisation and must ensure that their dealings with suppliers and customers reflect the organisation positively.
- 7.3 Employees who have concerns relating to the acceptance or giving of gifts and other entertainment items in connection with their business dealings should refer the matter to their manager.

## **8.0 Sponsorship**

Sponsorship must never be solicited by individuals from suppliers to the university. Where such sponsorship is offered without being requested it may only be accepted when expressly approved in writing by the line manager.

## **9.0 Derogations**

Derogations from this policy are not permitted other than in the most exceptional circumstances and then only with the express written approval of the President or Deputy President of Dublin City University.

## **10.0 Application**

This policy applies to all employees and directors of Dublin City University and its subsidiary companies.

## **Extract from the DCU Code of Conduct for Employees**

### **Section 5 (1)**

#### **(ii) Gifts**

- Employees will avoid giving or receiving gifts or benefits which might affect or appear to affect the ability of the donor or the recipient to make independent judgement on business transactions.

More specifically,

- Employees should not solicit gifts directly or indirectly.
- Any gift other than a modest token of nominal value should be courteously declined and should be reported to the employee's Head of Department. Gifts of nominal value that are generally considered as common business or social courtesies are acceptable as long as they are reasonable in type, frequency and value. If an employee has any doubt as to what constitutes a modest token, he/she should seek the guidance of his/her Head of Department.
- An employee should not, by virtue of his/her official dealing with a supplier, accept on his /her own or family's behalf, any special facility, or discount on a private purchase or service from the supplier

#### **(iii) Hospitality**

- Employees will avoid giving or receiving hospitality or preferential treatment which might affect or appear to affect the ability of the donor or the recipient to make independent judgement on business transactions.
- No objection would normally be taken to the acceptance of what is regarded as routine or customary hospitality, for example, a business lunch or attendance at an event, be it a civic or cultural event. Employees should seek guidance from their Head of Department if in doubt. Certain types of hospitality, for example, travelling abroad or holidays shall not be regarded as routine and should be referred to the Head of Department for guidance.