



**Higher Education Services
Gifts, Gratuities and Hospitality Policy**

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Higher Education Services Gifts, Gratuities and Hospitality Policy

1.0 Introduction

1.1 FutureLearn (“the Organisation”) is a UK-based global digital learning platform dedicated to widening access to high-quality online education. This policy governs the acceptance, refusal, and administration of all gifts made to FutureLearn as an organisation and all gifts offered to individuals acting on behalf of FutureLearn, including staff and associates.

1.2 This ensures compliance with UK law, protects organisational integrity, and prevents conflicts of interest or undue influence.

2.0 Scope

2.1 This policy applies to:

- Employees
- Senior leadership
- Contractors and consultants
- Course educators and academic contributors
- Mentors, moderators, and assessors
- Advisory board members
- Volunteers and ambassadors

2.2 It covers gifts from:

- Learners
- Donors
- Corporate partners
- Vendors and suppliers
- University partners
- Individuals associated with third-party institutions

3.0 Legal and Ethical Framework

3.1 Key legislation and guidance relevant to both organisational gifts and individual gifts include:

- **Bribery Act 2010** (prohibiting bribery, inducements, and facilitation payments)
- **Fraud Act 2006**
- **Public Contracts Regulations 2015** (supplier conduct for procurement gifts)
- **Charities Act 2011 & 2022** (for organisational gifts)
- **HMRC rules on taxable staff benefits**
- **Code of Fundraising Practice**
- **FutureLearn’s Conflicts of Interest Policy**
- **FutureLearn’s Anti-Bribery and Corruption Policy**

3.2 All gifts must comply with these obligations.

4.0 Gifts to Individuals at FutureLearn

4.1 FutureLearn recognises that gifts offered to individuals may arise from:

- Grateful learners

- Partner institutions
- Vendors seeking preferential treatment
- Consulting clients
- External organisations

4.2 Such gifts may create or appear to create conflicts of interest or undue influence.

4.3 Definition of a Gift to an Individual

A gift is anything of value offered to an individual in their professional capacity, including:

- Cash or cash equivalents
- Gift cards or vouchers
- Hospitality (meals, travel, accommodation, event tickets)
- Tangible items (books, electronics, benefits in kind)
- Discounts or services not available to the general public
- Honoraria or speaker fees
- Personal favours

5.0 Rules Governing Gifts to Individuals

5.1 As a general rule individuals must NOT accept gifts that could influence, or appear to influence, their professional judgement or duties.

5.2 Prohibited Gifts to Individuals must never be accepted, regardless of value:

- Cash
- Cash equivalents (gift cards, vouchers, prepaid cards)
- Cryptocurrency
- Personal loans
- Travel or accommodation paid by a vendor
- High-value items such as electronics, jewellery, luxury goods
- Gifts from anyone involved in an active procurement process
- Gifts intended to influence course content, assessments, or academic decisions
- Gifts from learners seeking special treatment or personal support
- Gifts linked to bribery or undue influence under the Bribery Act 2010

5.3 Permissible Low-Value Gifts (“Token Gifts”) are low-value, infrequent items (typically under £50) may be accepted if:

- they are not linked to decision-making powers;
- they do not create an actual or perceived conflict of interest;
- they are shared with the team where possible (e.g., biscuits, chocolate).

5.3.1 Examples:

- A thank-you card
- A small book
- Coffee or modest refreshments
- Conference-branded merchandise

5.3.2 Any gift valued between £50 and above must be declared and may only be accepted with line manager approval.

5.4 Hospitality

5.4.1 Individuals may accept hospitality if:

- it is modest, proportionate, and infrequent;
- it serves an organisational purpose (e.g., a working lunch with a partner);
- it is approved in advance for events above £50 in value.

5.4.2 Lavish or recreational hospitality is not permitted.

5.5 Declining Gifts

5.5.1 If an individual must decline a gift, the response should be polite and professional, such as:

“Thank you very much for your kind offer. FutureLearn has a policy that prevents staff from accepting gifts of this nature, but I truly appreciate the gesture.”

5.5.2 If returning a gift is impractical, it may be:

- donated to charity;
- added to a staff raffle;
- logged and handled according to internal governance.

6.0 Reporting & Register of Gifts

6.1 FutureLearn will maintain a Register of Gifts and Hospitality.

6.2 Individuals must record:

- any gift over £50;
- any hospitality over £50;
- any offer of a prohibited gift (even if declined);
- any situation where a conflict of interest may arise.

6.3 Line managers and Compliance will review the register periodically.

7.0 Gifts to FutureLearn (Organisational Gifts)

7.1 General Principles

All previous sections of the organisational policy still apply, including:

- acceptance of donations;
- review of high-risk gifts;
- UK regulatory compliance;
- donor recognition rules;
- due diligence (AML, sanctions, reputational checks);
- corporate philanthropy standards;
- Gift Aid eligibility;
- treatment of restricted and unrestricted funds.

7.2 Process for Acceptance of Organisational Gifts

7.2.1 Initial Offer

- Any offer of a gift from an organisation or corporate donor should be directed to the People team.
- Basic information about the donor, the nature of the gift, and any proposed restrictions should be recorded.

7.2.2 Preliminary Assessment

The People team conducts an initial review to identify:

- potential reputational risks;
- alignment with FutureLearn's values and objectives.

7.2.3 Due Diligence

- High-risk gifts or gifts exceeding defined thresholds (£50) undergo enhanced checks, including:
 - anti-Money Laundering (AML) checks;
 - sanctions screening;
 - reputational background checks.

7.3 Approval

7.3.1 Gifts meeting all criteria are submitted to the authorised approver(s) (e.g., Managing Director or Finance Director) for formal approval.

7.3.2 Any gift that raises concerns may be declined or require further investigation.

7.4 Gift Documentation

7.4.1 All accepted gifts must be formally documented, specifying:

- value or nature of the gift
- donor details
- restrictions (if any)
- treatment as restricted or unrestricted funds
- Gift Aid eligibility (if applicable).

7.5 Recognition and Stewardship

7.5.1 Donors are acknowledged according to organisational donor recognition rules.

7.5.2 Ongoing engagement or reporting may be conducted for restricted gifts to ensure proper use.

8.0 Conflicts of Interest

8.1 Any individual gift that could compromise or appear to compromise:

- procurement decisions;
- partnerships;
- content commissioning;

- educator relationships;
- platform neutrality;
- must be disclosed immediately.

8.2 Failure to disclose gifts may lead to disciplinary action.

9.0 Enforcement & Non-Compliance

9.1 Breaches of this policy may constitute:

- misconduct or gross misconduct
- a violation of the UK Bribery Act 2010
- a conflict-of-interest failure
- reputational harm to FutureLearn

9.2 Sanctions may include:

- disciplinary action
- termination of contract
- reporting to legal authorities (if required by law)

10.0 Review of Policy

10.1 This policy will be reviewed every three years, or earlier if:

- UK legislation changes,
- internal structure changes,
- the Fundraising Regulator updates standards,
- major incidents or investigations occur.