



Gifts and Hospitality Policy

Document Control

Policy owner: Director

Approved by: Board of Trustees

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1. Purpose

The Natural Sciences Museum, Sheffield (“NSM”) is committed to maintaining the highest standards of integrity, propriety and public trust.

This policy sets out the rules for the offering, giving, receiving, declining, recording and reviewing of gifts and hospitality connected with NSM’s activities. Its purpose is to:

- protect NSM, its Trustees, staff and volunteers from actual, potential or perceived impropriety;
- ensure decisions are taken only in NSM’s best interests;
- reduce the risk of conflicts of interest, bribery, undue influence or reputational harm; and
- provide a clear and proportionate framework for declarations, approvals and record keeping.

2. Scope

This policy applies to all:

- Trustees;
- the Director;
- Heads of Department;
- employees;
- volunteers;
- interns, secondees and casual workers; and

- any other person acting on behalf of NSM.

It covers gifts and hospitality:

- offered to, received by, or declined by individuals in connection with their NSM role;
- offered or given by NSM to third parties using NSM funds or resources; and
- connected to suppliers, contractors, donors, sponsors, lenders, partners, researchers, visiting organisations, public officials, artists, consultants and other stakeholders.

3. Policy Statement

No one acting for NSM may solicit, accept, offer or give any gift or hospitality that:

- influences, or could reasonably be seen to influence, a decision;
- places them under an obligation to a third party;
- is excessive, inappropriate or disproportionate;
- creates a conflict of interest or conflict of loyalty;
- could be regarded as a bribe, inducement or reward; or
- could damage NSM's reputation.

NSM recognises that modest and legitimate gifts or hospitality may arise in the normal course of professional, cultural, ceremonial or partnership activity. Such items may only be accepted or offered where they are reasonable, infrequent, transparent and consistent with this policy.

4. Definitions

Gift means any item, benefit or token of value given without payment or at below market value. This includes, for example, bottles, hampers, vouchers, books, tickets, discounts, services, loans of personal benefit, or personal use of property.

Hospitality means meals, refreshments, receptions, entertainment, travel, accommodation, invitations or other forms of hosting connected with NSM business.

Cash equivalent includes money, gift cards, vouchers, prepaid cards or anything readily convertible into cash.

Conflict of interest includes any situation where personal interests, loyalties or relationships could, or could appear to, affect objective decision-making.

5. Core Principles

5.1 Integrity

Individuals must act honestly and in NSM's best interests at all times.

5.2 Independence

No gift or hospitality may be accepted or offered where it could affect, or appear to affect, independence of judgment.

5.3 Proportionality

Any gift or hospitality must be modest, reasonable and proportionate to the circumstances.

5.4 Transparency

Relevant gifts and hospitality must be declared, approved where required, and recorded accurately.

5.5 Reputation

No gift or hospitality may be accepted or given if it could embarrass NSM or undermine public confidence were it to become public knowledge.

5.6 Charity stewardship

Any expenditure of NSM funds on gifts or hospitality must be capable of justification as being in NSM's interests and supportive of its charitable purposes, operations or stakeholder relationships.

6. Prohibited Gifts and Hospitality

The following must not be accepted, offered or given under any circumstances:

- cash or cash equivalents;
- gifts or hospitality intended to influence a decision;
- gifts or hospitality during a live procurement, tender, grant assessment, recruitment or other competitive process, unless expressly authorised in advance and clearly for legitimate business reasons;
- gifts or hospitality that are lavish, frequent or excessive;
- gifts or hospitality of a personal nature unrelated to NSM business;
- gifts or hospitality that would breach the law, funder rules, contractual obligations, or another NSM policy;
- gifts or hospitality from any person or organisation seeking preferential treatment from NSM.

7. Acceptable Gifts and Hospitality

Subject to this policy, the following may be acceptable:

- modest working refreshments or meals connected to legitimate business meetings;
- low-value tokens of courtesy or customary seasonal gifts;
- occasional invitations to events where attendance serves a clear NSM purpose;
- protocol or ceremonial gifts where refusal would clearly cause offence or harm an important relationship.

Acceptance is only permitted where the item is modest, infrequent, lawful, appropriate and not connected to any expectation of advantage.

8. Thresholds and Declarations

8.1 Items under £50

A gift or hospitality below £50 may be accepted without prior written approval only where it is:

- modest and infrequent;
- not cash or a cash equivalent;

- not linked to any decision or expected favour; and
- unlikely to create embarrassment or a perception of influence.

If there is any doubt, it must be declared.

8.2 Items over £50

Any gift or hospitality with an estimated value of more than £50, whether on one occasion or in aggregate from the same source within a 12-month period, must:

- be declared promptly;
- be recorded in the Gifts and Hospitality Register; and
- be approved or reviewed in accordance with this policy.

8.3 Multiple or repeated offers

Repeated low-value offers from the same source must be considered cumulatively. If the total estimated value exceeds £50 within a 12-month period, the offers must be recorded and reviewed.

9. Approval Rules

9.1 Staff

Staff must notify their Head of Department of any gift or hospitality that:

- exceeds the reporting threshold;
- may give rise to concern; or
- is connected to procurement, sponsorship, donor relations or another sensitive matter.

9.2 Approval authority

Approval authority is:

- Staff: Head of Department;
- Heads of Department: Director;
- Director: Chair of Trustees;
- Trustees: Chair of Trustees, or Vice-Chair/another non-conflicted Trustee where the Chair is involved.

9.3 Sensitive situations

Prior approval is required, wherever practicable, for any gift or hospitality involving:

- existing or prospective suppliers;
- sponsors or major donors;
- a live tender or procurement;
- regulated or public-sector counterparties;
- travel or accommodation;
- invitations with an estimated value above £50.

Where prior approval was not practicable, the matter must be declared and recorded as soon as possible afterwards.

10. Gifts Received on Behalf of NSM

A gift given to an individual because of their role at NSM may, where appropriate, be treated as a gift to NSM rather than to the individual personally.

Where a gift exceeds the threshold, or where retaining it personally would be inappropriate, NSM may require that it is:

- retained by NSM for official or display use;
- shared within the department;
- donated to a charity raffle or fundraising purpose; or
- otherwise disposed of as directed by the Director or Trustees.

No individual has an automatic right to retain a gift received through their NSM role.

11. Hospitality Given by NSM

Any hospitality funded by NSM must:

- have a legitimate museum, charitable, educational, research, partnership or stakeholder purpose;
- be reasonable and proportionate;
- represent proper stewardship of NSM resources; and
- be approved in line with delegated authority and financial procedures.

Lavish or unnecessary hospitality must not be provided.

12. Procurement, Donor and Sponsorship Safeguards

Special care must be taken where gifts or hospitality involve:

- procurement or contract management;
- major donors or fundraising prospects;
- sponsorship arrangements;
- loans, acquisitions or disposals;
- grant-funded projects.

No person may accept gifts or hospitality from a current or prospective supplier, donor, sponsor or bidder where this could affect, or appear to affect, impartiality.

During a live procurement or competitive exercise, gifts and hospitality from bidders or potential bidders must normally be declined.

13. Conflicts of Interest

Any gift or hospitality that may create an actual, potential or perceived conflict of interest must be declared immediately.

Trustees must follow NSM's conflicts procedures and governing document. Where a conflict cannot be properly managed, the gift or hospitality must be declined, or the individual must take no part in the relevant matter.

14. Register and Record Keeping

NSM will maintain a Gifts and Hospitality Register.

The following must be recorded:

- all gifts and hospitality accepted with an estimated value above £50;
- all gifts and hospitality declined with an estimated value above £50;
- any item below £50 where there is a concern about influence, repetition, perception or conflict;
- any gift or hospitality involving Trustees, the Director, procurement, donors, sponsors or sensitive decisions.

Each entry should include, where relevant:

- date;
- name and role of recipient or giver;
- organisation or person offering or receiving;
- description of the gift or hospitality;
- estimated value;
- whether accepted or declined;
- business reason;
- any conflict identified;
- approval given; and
- final outcome or disposal.

15. Review and Oversight

The Director is responsible for ensuring the register is maintained and reviewed periodically.

The Board of Trustees will review gifts and hospitality information at least annually, and may request interim reports where necessary.

Any patterns of concern, repeated offers from one source, unusual approvals, or high-risk items must be escalated to the Trustees.

16. Roles and Responsibilities

16.1 Trustees

Trustees are responsible for overall oversight of this policy and for setting the tone of integrity and transparency.

16.2 Director

The Director is responsible for implementing the policy, ensuring staff awareness, maintaining effective controls and reporting significant issues to the Trustees.

16.3 Heads of Department

Heads of Department are responsible for ensuring declarations are made, approvals are handled promptly, and staff in their departments understand and follow this policy.

16.4 Staff and volunteers

All staff and volunteers must exercise judgment, declare relevant matters promptly, and seek advice whenever there is uncertainty.

17. Breaches

Failure to comply with this policy may result in:

- withdrawal of delegated authority;
- disciplinary action;
- referral to the Trustees;
- requirement to return, surrender or repay the value of a gift or hospitality; or
- referral to external authorities where appropriate.

18. Advice and Escalation

Any person who is unsure whether to accept, offer, decline, record or approve a gift or hospitality must seek advice before proceeding wherever possible.

Questions should be escalated through the following route:

Staff → Head of Department → Director → Chair of Trustees

19. Review

This policy takes effect on 01/04/2026 and will be reviewed by 01/04/2029, or earlier if required by changes in law, regulation, charity guidance or NSM's structure.