
January 2015

ABERYSTWYTH UNIVERSITY

**Handbook of Financial
Procedures**

Financial Procedures and Related Policies

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Section 1: Financial Procedures

- 1.1 This document sets out the University's Financial Procedures and Related Policies and forms an appendix to the Financial Regulations. The Financial Regulations are also available from the Finance Department or via the Finance Department web pages <http://www.aber.ac.uk/en/finance-department/> . The Financial Procedures Handbook does not require formal Committee endorsement, but must be approved by the Executive.
- 1.2 Should there be an apparent conflict between the Regulations and the Procedures, the Regulations shall take precedence.
- 1.3 The Director of Finance shall arrange for the Financial Procedures to be reviewed annually and for all proposed changes to be submitted to the Executive for approval.

1.4 Accountable Budget Controllers and Senior Budget Managers

The responsibility of Accountable Budget Controllers (ABCs) and Senior Budget Managers for financial management is as indicated in the table below:

Department	Senior Budget Manager	Accountable Budget Controller (ABC)
Academic Quality and Records Office	Director Head	Pro-Vice Chancellor Student Experience and International
Arts Centre	Director	Pro-Vice Chancellor Welsh Language and Culture, and External Relations
Careers	Director	Pro-Vice Chancellor Student Experience and International
Centre for the Development of Staff and Academic Practice	Coordinator	Pro-Vice Chancellor Student and Staff Services; Director of Human Resources
Centre for Welsh Language Services	Manager	Pro-Vice Chancellor Welsh Language and Culture, and External Relations
Communications, Marketing and Public Affairs	Director	Pro-Vice Chancellor Welsh Language and Culture, and External Relations
Design, Web, Printing & Postal Services	Manager	Pro-Vice Chancellor Welsh Language and Culture, and External Relations
Development and Alumni Relations	Director	Pro-Vice Chancellor Welsh Language and Culture, and External Relations
Estates Development	Director	Pro-Vice Chancellor Student and Staff Services
International Office	Director	Pro-Vice Chancellor Student Experience and International
Information Services	Director	Pro-Vice Chancellor Student and Staff Services
Research, Business and Innovation	Director	Pro-Vice Chancellor Research and Academic Quality

Campus Services	Director	Pro-Vice Chancellor Student and Staff Services
Health, Safety and Environment	Head	Pro-Vice Chancellor Student and Staff Services
Sports Centre	Manager	Pro-Vice Chancellor Student and Staff Services
Student Support	Director	Pro-Vice Chancellor Student and Staff Services
Academic Departments	Head of Department	Institute Director
Institute	Institute Director	Vice Chancellor
Finance	Director	Pro-Vice Chancellor Student and Staff Services
Planning	Director	Pro-Vice Chancellor Student Experience and International

1.5 Executive

For reference, the Executive's reporting lines are:

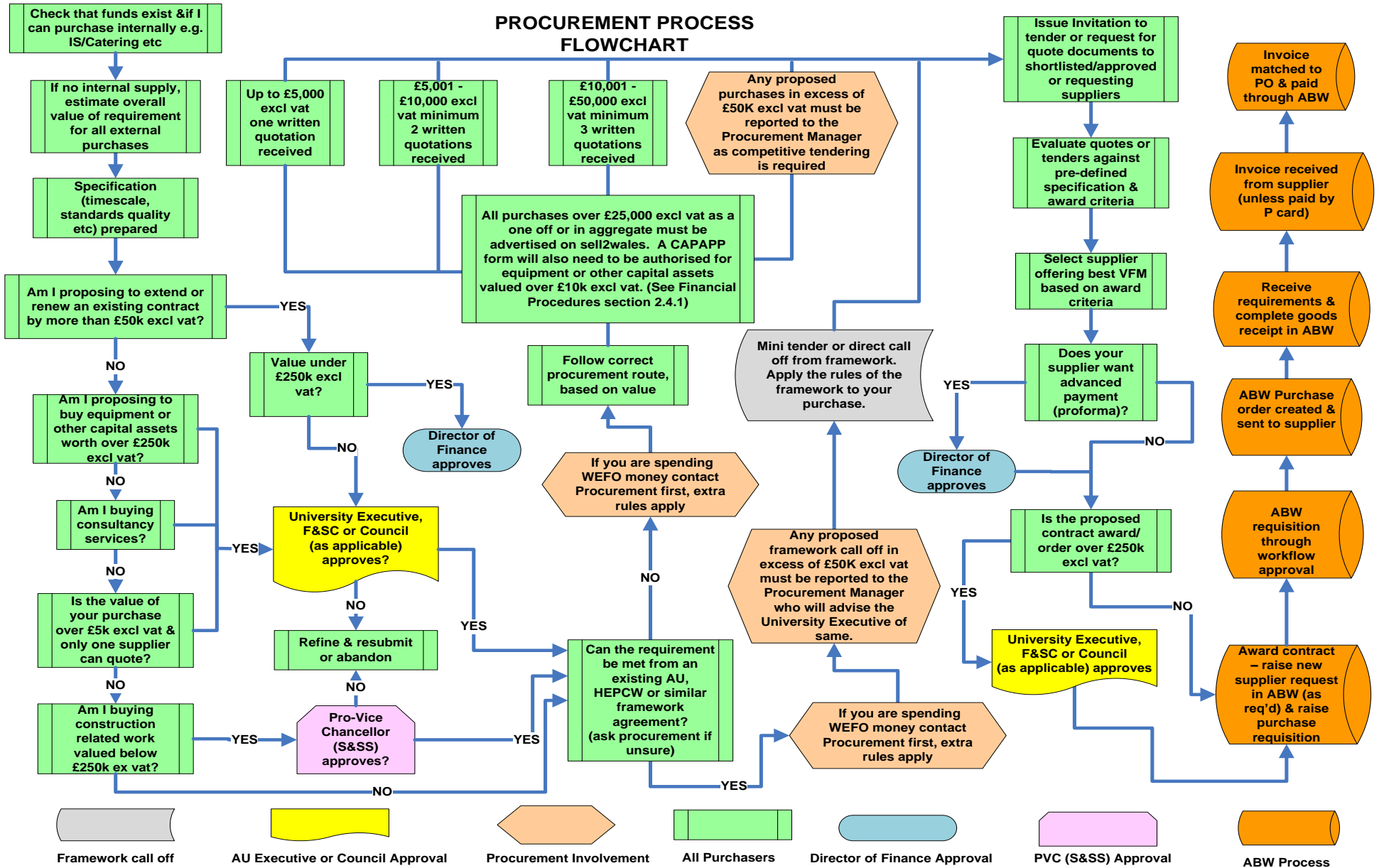
The Executive	Reporting to
Vice-Chancellor	Chair of Council
Pro-Vice Chancellor Student and Staff Services	Vice-Chancellor
Pro-Vice Chancellor Research and Academic Quality	Vice-Chancellor
Pro-Vice Chancellor Student Experience and International	Vice-Chancellor
Pro-Vice Chancellor Welsh Language and Culture, and External Engagement	Vice-Chancellor
Director of Finance	PVC Student and Staff Services
Director of Planning	PVC Student Experience and International
Director of Human Resources	PVC Student and Staff Services

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Section 2: Purchasing policy and procedures

Section 2: Purchasing policy and procedures

- 2.1** The flowchart below sets out the University procurement process – further details on each step can be found in the Procurement Manual (contact the [Procurement Office](#) for more details).

PROCUREMENT PROCESS FLOWCHART



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- 2.2. It is the University's policy to support wherever possible the purchasing arrangements made by the Higher Education Purchasing Consortium Wales (HEPCW) or other consortium agreements to which Higher Education institutions in Wales have access providing these offer value for money (which can be tested as required by benchmarking). Details of current HE sector framework agreements are provided on the GeM HE Sector website at: www.gem.ac.uk

Links to other framework websites are available via the Procurement Manager.

2.3 HOW PROCUREMENT IS TO BE CARRIED OUT

2.3.1 Introduction

This section of the Financial Procedures is intended to help staff maximise the value for money that the University obtains.

The rationale for this is that, more than ever before, universities must nowadays be able to show that they spend money wisely. HEFCW, the National Audit Office and many other external bodies take an interest in university procurement, particularly when public money is being spent. We as taxpayers should also expect our money to be used wisely and well, and when we have purchasing responsibilities we can do something to make sure that it is.

2.3.2 Procurement within the University

Day-to-day procurement responsibility is delegated to Senior Budget Managers and they, in turn, may delegate to other staff. Procurement within the University is subject to the general supervision of the Director of Finance and may be scrutinized by internal or external auditors.

General queries on purchasing and on sources of supply may be directed to the Procurement Manager (contact details available on the Procurement intranet pages: <http://www.aber.ac.uk/en/finance-office/procurement/>)

Briefly,

- Senior Budget Managers are responsible for ensuring that procurement is carried out in a professional manner and that the correct procedures are followed
- By those who are authorised to commit funds.
- Within the limits of their financial authority.
- Below the threshold (£100k) excluding VAT for involvement of the Procurement Manager in formal tendering procedures.

The University's procurement strategy is to obtain the best value for money at the lowest administrative cost and to be able to demonstrate effectiveness in procurement

These aims will be achieved by the use of a devolved procurement structure and by the use of local and national purchasing agreements negotiated by organisations such as HEFCW (these can be found on GeM at www.gem.ac.uk) or the Government Procurement Service (Crown Commercial Services) or the National Procurement Service for Wales (NPS). Where purchasing agreements exist, they are to be used unless a clear benefit, such as better value for money can be shown and formal approval must be sought for such departures from agreements consistent with the Financial Delegations of Authority contained in the University Financial Regulations. It is extremely important to use framework agreements where practicable and where good value for money can be secured as the NPS have powers to challenge the development of local arrangements (or use of competing frameworks) in lieu of adopting prevailing NPS 'all Wales' cross sector framework agreements.

All requests to establish new Procurement Framework Agreements (outside of the public sector schemes to which the University is a member, for example the Higher Education Purchasing Consortium for Wales (HEPCW), (CCS) or (NPS) must be first subject to a value for money exercise, which should clearly demonstrate the benefits, risks and financial implications of the Agreements. Approval must be obtained from the Finance & Strategy Committee in all instances. 'Establish' in this context includes adopting/joining a framework to which the University is not a member, at any

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point during its lifetime.

It should be remembered that value for money does not mean lowest cost. Value for money is the optimum combination of whole life costs and quality to meet the user's requirements. Whole life costs include the administrative costs and fitness for purpose to the University associated with the procurement.

Welsh Procurement Cards should be used where appropriate and within individual limits, to minimise the processing costs of transactions (see guidance at <http://www.aber.ac.uk/en/finance-office/procurement/welsh-purchasing-card/>). Where the Welsh Procurement card is not used, a Purchase Order should always be raised when placing an order with a supplier, irrespective of whether another form of contract is in place. Orders should also be raised for services such as software maintenance or insurance. This requirement is waived for certain expenditure as set out below:

- Utility Bills
- Expenses Claims
- Transactions paid by Direct Debit
- Emergency Situations (e.g. veterinary emergencies, lift entrapment and release etc.)
- Oligos (IBERS)

The University's standard payment terms are 30 days from invoice date and this must not be varied on any proposed transaction valued in excess of £10,000 excluding VAT (either singularly or in aggregate) without the prior consent of the Director of Finance.

2.4. THE PROCUREMENT PROCESS

2.4.1 Before proceeding to purchase externally, four things should be established:

- that the desired goods or services are not already available elsewhere in the University;
 - that the desired goods or services are necessary for operational requirements;
 - that sufficient authorised funding exists; and
 - that the University does not already have access to a pre-tendered framework or contract in place that could provide the goods or services, neither could the requirement be met via an internal service provider.
- If the purchase is for equipment or other capital assets greater than the capitalization limit of £10,000 excluding vat then a capital approval form (CAPAPP) must be completed and approved consistent with the primary and secondary financial delegations of authority. A CAPAPP form is however not required for capital asset proposals which are to be acquired as part of already approved external funding e.g. equipment to be procured as part of external research grant funded projects, approval of which by the funding sponsor will have included formal appraisal of proposals for capital asset acquisitions typically at the time of grant application submission.

2.4.2 The University appreciates that from time to time there will be a requirement to single source goods and services. In such instances all applications in excess of £5,000 and up to £50,000 excluding VAT must be sent to the Director of Finance for consideration, using a single tender approval (STA) form available from the Finance Department web pages. A copy of the STA should also be provided to the University's Procurement Manager.

All STAs in excess of £50,000 excluding VAT must be sent to the University's Procurement Manager (or nominee) who will coordinate and submit for consideration by the Executive.

Given the diary commitments of senior executive officers, all STAs (irrespective of value) should be submitted at the earliest opportunity to minimise the prospects of delay.

2.4.3 When EU Procurement Directives apply, any contract of supply to a publicly funded organisation for goods or services with a value greater than £172,514 (net of VAT) must be advertised in the Official Journal of the European Union (OJEU) and tenders must be sought. The same applies to contracts for works with a value

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greater than £4,322,012 (net of VAT). These thresholds are valid until 31 December 2014.

- 2.4.4 Whenever a contract meets the criteria for advertising in the OJEU, the Procurement Manager must be consulted at the outset. Devolved purchasers are not permitted to make their own OJEU arrangements. Note – 2.4.5 below means this should already be covered.
- 2.4.5 All proposed procurements in excess of £50k excluding vat should be reported to the Procurement Manager at the earliest opportunity to ensure a value for money procurement process is established from the outset. The Procurement Manager will provide progress reports to the Executive at the outset and regularly afterwards on all such qualifying purchases.
- 2.4.6 Subject to 2.3.2 all orders must be documented in advance of receiving any goods, services or works, via an approved Purchase Order. The Finance Department may conduct a review of departments issuing purchase invoices and not raising purchase orders, and where a department cannot provide evidence that an order has been raised and the goods have been received, payment of the invoice may be postponed while an investigation is conducted.

2.4.7 Tendering Thresholds

All contracts outside an HEPCW or similar agreement are to be made on the basis of competitive tender or quotations as set out in the table below. It is critically important that all purchases are correctly valued at the outset; see the aggregation guidance previously issued by the Procurement Manager or consult the Procurement Manager directly as required.

Where quotations and tenders are obtained, in accordance with the limits set out below, these should be retained on file for a period of no less than 6 years after contract termination with a note giving the reasons for the selection of the preferred quotation/tender.

The following limits apply in respect of quotations or tenders, except:

- those through existing frameworks where the competition requirements of the specific framework should be followed.
- those requirements that are variations to existing contracts; see below.
- for WEFO purchases consult the Procurement Manager as additional procedures apply.

There is a general requirement to openly advertise all procurements over £25,000 EXCL VAT, typically via either the OJEU or sell2Wales (as applicable). Any dispensation from having to meet this requirement must be obtained in writing from the Executive (or their nominee)

Total (NOT annual) Contract Value (Contracts must not be split to avoid these limits) Ex VAT	Procurement Method	Additional Notes
£1000 - £5,000	Minimum 1 written quotation received	Additional (i.e.: 2 or 3) written quotations should be sought, where it appears that the benefits of competition are commensurate with the administrative and other costs involved.

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£5,001 - £10,000	Minimum 2 written quotations received	Additional (i.e.: 3) written quotations should be sought, where feasible within time and market constraints.
£10,001 -50,000	Minimum 3 written quotations received	Where feasible within time and market constraints three written competitive tenders should be sought as opposed to quotations (please refer to the Procurement Manual for advice on the process for quotations versus competitive tenders and tender board procedures).
£50,001 - £100,000	Minimum 3 Competitive Tenders received	Please refer to Procurement Manager for tender procedure guidance.
£100,000+	Minimum 3 Competitive Tenders received	Procurement Manager to be notified and involved in value for money procurement process. Advertising to be used unless waiver approved to the contrary. EU Procurement Directives apply to AU EU Tendering Procedures may apply to contracts in excess of £172k172k, except for Works contracts where the EU limit is raised to contracts with a value exceeding £4.3m.

Where the minimum number of quotations or tenders is not achieved, an evaluation of received bids may continue provided no new participating suppliers are invited to quote or tender retrospectively after the closing date for bids (unless competition has been formally re-opened/re-started) and where at least two admissible offers are received. In all such instances, the Procurement Manager is to be advised in writing of any decision to proceed with an evaluation with fewer than the minimum number of bids received for purchases in excess of the competitive tendering threshold of £50,000 excluding vat, for onward reporting to the University Executive and in any event appropriate records must be kept for audit scrutiny. No evaluation may be concluded or completed nor an offer of contract made or purchase order placed where the value of the proposed purchase is in excess of £5,000 excluding vat & competition is sought but only one bid is received, without the prior authorisation of the University Executive or Director of Finance (consistent with Financial Delegations of Authority), which must be sought via a written request (single tender action form) submitted to the Director of Finance consistent with 2.4.2 overleaf.

Contract Variations (including extensions)

Contract variations are only permitted where they are catered for in the original contract. Such variations should also be considered when originally valuing the contract (even if the variation may not subsequently be adopted) to determine which financial procedures must be followed to award the original contract. An existing contract should not be extended by more than 40% of its original value in total. The contract variation may increase or decrease the amount of services/goods provided, increase/decrease the contract length or widen or narrow the scope of services/goods (providing this has been allowed for in the contract drafting).

In the event that variations cannot be priced from the tendered contract rates, benchmarking should be used wherever feasible to ensure variations offer value for money. Proposed variations to existing contracts should be approved in accordance with summary of primary and secondary delegations. Any variations to previously approved expenditure specifically related to capital proposals are subject to the approval requirements in Appendix B of the Financial Regulations, in respect of the cumulative total of any proposed variations in excess of 5% off the capital project expenditure originally agreed. In any event, care is needed where a variation substantially alters a requirement beyond that contemplated in the original contract, especially where the variation also results in the overall contract value exceeding the applicable EU procurement threshold for goods, services or works in aggregate. Legal advice on the risk of such a variation may need to be sought before any approval can be granted. Staff should contact the Procurement

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Manager in such cases, in the first instance.

Details of the procedure for tendering may be obtained from the Procurement Manager. Permanent records must be kept of all tenders either by the Procurement Manager or the devolved purchaser, as applicable. These may be in either electronic or paper form. Some funders may require original paper copies and if this is the case care should be taken to ensure that they are available if required.

An individual supplier awarded more than £50,000 (net of VAT) work through non-competitive arrangements in any one University financial year will be subject to a value for money review by the Procurement Manager. An exception to this is in respect of approved contract variations to existing pre-tendered contracts where such variations are catered for in the original contract as above.

2.4. 8 Building Contracts and Appointment of Construction Related Consultants

All building/construction related procurements must be authorised by the Head of Estates Development Department or Head of Campus Services (if relating to Property Services Team) as appropriate, and utilise Constructionline or similar industry recognized body as part of any pre-qualification process during the overall tender process.

All building/construction related procurements excluding reactive maintenance organised by PST must be authorised by the Director of Estates Development Department (EDD), and utilise Constructionline or similar industry recognized body as part of any pre-qualification process during the overall tender process. EDD must be notified of all works being carried out by Campus Services (PST) on recurring maintenance issues which suggest potential failure of elements or services.

Additional written quotations above the minimum stated in the table above may be required if the work is the subject of an insurance claim.

Contracts for building works shall embody the terms of the current editions of one of the following as appropriate to the nature of the work being undertaken:

- (i) the RIBA Small Building Works contract.
- (ii) the General Conditions of Contract recommended by the Institutions of Electrical and Mechanical Engineers and the Association of Consulting Engineers.
- (iii) the General Conditions of Contract recommended by IMechE and IET.
- (iv) the Joint Contracts Tribunal Standard, Intermediate or Minor Works Contracts.
- (v) the appropriate contract from the New Engineering Contract Version 3 suite of contracts.
- (vi) any other form of contract which has first been approved by the Director of Finance.

2.5 Procurement Proforma – Single Tender Action

Single Tender Action

Description of what is being purchased and why it is required:

Budget Holder/Responsible Manager:

Sterling (£) value of proposed purchase (excl vat): £.....

If a contract, proposed contract period (max 4 years typically):

Work Order: Budget Approved: Y/N

Budget Holder Commentary & reason for single tender action:

**ALL REASONS PROVIDED MUST BE OBJECTIVELY EVIDENCED & DEFENSIBLE
(FOR INTERNAL AUDIT SCRUTINY) – ONE OR MORE OF THE FOLLOWING MAY APPLY OR AN ADDITIONAL REASON NOT LISTED BELOW MAY BE RELEVANT**

Notes

(i) **Extreme Urgency** – Such cases are more likely to be rejected where the reason for urgency is attributable to the person/department seeking to rely on it, especially where the reason for the urgency could also have been reasonably foreseen.

(ii) **Absence of tenders, only one tender received or suitable tenders in response to an invitation** – where evidence can be provided that you have tried to comply with financial regulations by inviting competitive tenders but you received either no bids in return, only one bid or none that you could accept as being compliant/suitable and you therefore want to negotiate a solution with a single supplier (justify this choice of supplier objectively)

(iii) **For reasons of protection of exclusive rights or technical reasons there is only one possible supplier** –

Two tests must be satisfied:-

- An objectively technical or exclusive rights reason must exist AND

- There must be only one possible supplier.

Actual evidence of sufficient exposure to/engagement of the market to prove the case being claimed is expected (e.g. how have you engaged or researched the market in sufficient depth to objectively prove the single supplier argument – did you openly advertise for expressions of interest, for example, but got only one reply?)

(iv) A direct award call off under a framework agreement – in this situation please provide details of how the decision to make a direct call off without re-opening competition was reached in terms of best value, with complimentary details of the circumstances, under the rules of the framework, which permit a direct award to be made

(v) An extension or renewal (variation) of an existing contract is required – in this situation please provide supporting evidence as to how your request complies with all the qualifying requirements of 2.4.7 of the Handbook of Financial Procedures concerning contract variations. Additionally, If your request specifies technical reasons associated with additional goods/services/works having to be purchased from an existing supplier by contract variation, you will be expected to objectively demonstrate how separating your requirements here from those that have gone before would lead to major inconvenience to the University because of :-

- *Disproportionate technical difficulties with the proposed purchase if made from elsewhere OR*
- *Economic disadvantage to the University if the purchase is made from elsewhere OR*
- *Continuity is strictly necessary to the performance of a new contract.*
- *However, consistent with EU case law, if the value of your case here reflects a substantial modification to the original contract valuation and/or specification and/or the outcome is that an extended timeline is needed for the continuity requested then a new tender exercise may nonetheless still be required.*

(vi) Other (please state below)

Reason for single tender action including proof that this proposal represents value for money:-

Consistent with section 5 of the AU Handbook of Financial Procedures I confirm that no conflicts of interest are declarable to the AU Executive related to this application.

Signed :..... Date:.....

Financial Approvals

Approved:

Name: Position:

Date:

Reason for Rejection (as applicable) & further instructions

APPROVED CASES MAY PROCEED AS FOLLOWS:

- A written quotation may be obtained from the sole supplier in lieu of sealed tenders or competitive quotations
- The contractual position (i.e. whose terms and conditions apply – ours or the supplier’s) must be agreed as part of the quotation process before any order is placed.
- Checks should be carried out on statutory matters (e.g. position of the supplier as regards the bribery act etc.) – please consult the Procurement Manager for assistance.
- Any quotation amount over the agreed budget in this form requires additional written authorisation by the budget holder/responsible manager, before funds can be committed.
- Additionally, any subsequent quotation amount over the agreed budget requires further authorisation by the University Executive before funds are committed (consult Director of Finance for assistance).

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Section 3: Expenses Manual

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3.1 SCOPE

- 3.1.1 This manual is intended for use by employees authorising or processing payments to other employees and by employees who are making expense claims. It sets out the tax treatment of payments made in accordance with University policy. Any claims made outside of University policy should be referred to the Payroll Manager.
- 3.1.2 Receipts are always required and these should, wherever possible, be valid VAT receipts.

3.2 GENERAL

- 3.2.1 Travelling and subsistence expenses incurred on University business journeys and other expenses which are “wholly, exclusively and necessarily incurred in the performance of an employee’s duties” will not be liable to tax or national insurance. If you have any queries about authorising or claiming items of expenditure incurred on business trips, please contact the Finance Department for advice but in all cases, employees should endeavour to exercise the same care in incurring expenses as if travelling for personal reasons.
- 3.2.2 Expenses should only be claimed or authorised if expenditure has actually been incurred. Whenever possible, this will be evidenced by a receipt (unless stated elsewhere within this manual).
- 3.2.3 If these procedures are not followed, the individual will be liable for tax and National Insurance on non-qualifying expenses.
- 3.2.4 Expense claims procedures for Council members and other non-staff members of University committees are given in a separate document which is available from the Clerk to the Council.

3.3 EXPENSE CLAIM

- 3.3.1 Note that travel is to be booked wherever possible through our travel suppliers which will minimise any outlay in advance by individuals.
- 3.3.2 If expenses are incurred, claims should be completed (by paper or online) on at least a monthly basis. The University will not reimburse claims if the claim is submitted more than three months after the expense is incurred.
- 3.3.3 Details must be shown on the expense claim form in accordance with this manual.
- 3.3.4 Actual expenditure should be claimed subject to the maximum rates as set out in the guidelines for employees travelling on university business.
- 3.3.5 The claim should be approved by an authorised signatory prior to payment being made.

3.4. ADVANCE EXPENSE REQUESTS

- 3.4.1 Note that travel is to be booked wherever possible through our travel suppliers which will minimise any outlay in advance by individuals.
- 3.4.2 If funds are required in advance of travel by an employee a request can be made via the Advance Expenses Request Form.
- 3.4.3 An expense claim form with full details of actual expenditure incurred, together with supporting documentation, must be submitted within one month of return.

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- 3.4.4 In the event of monies being unused a refund must be made to the Finance Department within one month of return.
- 3.4.5 The value of advance received will be recorded on the employee's accounts payable record and may be off-set against other subsequent claims.
- 3.4. UNIVERSITY WELSH PROCUREMENT CARD**
- 3.4.1 A University Welsh Procurement card is provided by the University to those employees who make frequent and/or large expense claims. These cards are issued to authorised employees on the recommendation of the Accountable Budget Manager and subject to the approval of the Director of Finance. These cards operate like a credit card and the University pays by direct debit monthly for the previous month's expenditure.
- 3.4.2 The University typically operates a strict one card per department policy with individual cards provided on an exceptional basis due to business needs.
- 3.4.3 The University requires employees to complete a procurement card transaction log for all claims for expenditure incurred on the Welsh Procurement Card. The log should show the same detail as if it were a normal claim using the reimbursement form at <http://www.aber.ac.uk/en/finance-office/information-for-staff/forms/>. No private expenditure must be charged to the University Welsh Procurement card and this will be dealt with immediately as a disciplinary matter. Receipts must be made available on request for authorisation or audit purposes. Cardholders should retain receipts and transaction logs locally for six years for audit and tax purposes. The Welsh Procurement card and any outstanding receipts must also be returned when a member of staff leaves the University's employment and subsequently destroyed by the Finance Department. Departments failing to provide details of the codes to which the expenditure relates to, may face the card being temporarily suspended.
- 3.4.4 The online statement will be sent by workflow to the appropriate delegated authority for authorisation. Accountable Budget Controllers' claims require the authorisation of the Vice-Chancellor or Director of Finance or their line-manager within the Executive. The Chief Operating Officer/Pro Vice Chancellor is responsible for approving the Vice Chancellor's expenses. All other members of the Executive are approved by the member of the Executive they are responsible to.
- 3.4.5 The Director of Finance reserves the right to refuse to issue a Welsh Procurement card if it is considered inappropriate.
- 3.4.6 The Director of Finance also reserves the right to withdraw a Welsh procurement card from anyone to whom it has been issued. Cards will be cancelled immediately on termination of employment as an Aberystwyth University staff member.
- 3.4.7 Accountable Budget Controllers, Senior Budget Managers and cardholders are reminded of the following:
- That use of the Welsh Procurement card for personal purchases is absolutely forbidden. In the event that the card is used in error, then this must be brought to the attention of the budget holder and reimbursement arranged immediately.

That the cardholder is responsible for the custody and security of the card at all times. Cardholders will be personally responsible if the card is delegated to other individuals and misused.

- 3.4.8 Three tiers of usage of the Welsh Procurement card are envisaged:
- Tier 1 – Travel, Subsistence and Basic Expenses specifically or
- Tier 2 –Department Level (including Travel, Subsistence and Expenses).
- Tier 3 – Dedicated 'lodged' purchase cards.
- 3.4.9 Most purchase cards are expected to be issued at tier 2 given that they reflect a one card per department solution. 3.4.11 Tier 2 cards should be used (within allocated one-off and monthly total card limits) in the

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following situations:

- For one-off purchases where the supplier will accept card payment and the predicted spend is below £2,000 excluding vat.
- For the purchase of goods and services through the GeM marketplace.
- For on line purchases where the supplier will accept card payment
- For travel and subsistence requirements
- In exceptional circumstances, and with the prior approval of the Director of Finance.

3.4.12 Tier 2Cards (and tiers 1 & 3, as applicable) should not be used in the following situations:

- For purchases in excess of the allocated card limit. Orders should not be split in order to avoid the card limits. If a higher limit is required on an occasional or regular basis approval to a higher limit should be sought through the same route as for the initial card application,
- For personal use
- For the purposes of avoiding the use of existing or similar frameworks or contracts
- For the purposes of avoiding the use of AU departments to provide the services or supplies e.g. purchasing computer equipment direct from supplier rather than through IS.

3.4.13 A set of answers to Welsh Procurement card Frequently Asked Questions is maintained in the Procurement Manual.

3.5. ETHICAL CONDUCT

3.5.1 Staff should always seek to uphold and enhance the standing of the University and should never use their authority or office for personal gain, by always maintaining high standards of ethical behaviour, fostering high standards of professional competence, optimizing the use of resources which they influence and for which they are responsible to provide the maximum benefit to the University & complying both with the letter and the spirit of the law of the UK and contractual obligations

3.5.2 Staff must respect the confidentiality of information received in the course of employment.

Similarly, information given out should be true and not intended to mislead.

3.5.3 A close and co-operative relationship with a supplier is often mutually beneficial. Staff must, however, maintain impartiality and not compromise fair competition.

3.5.4 Staff are reminded of the duty to disclose personal interests:

- Employees becoming aware of any personal financial or other beneficial interest in a transaction or financial arrangement of the University shall immediately disclose the fact and nature of the interest to the Director of Finance.
- Employees shall declare to the Director of Finance any interest in a business which may supply or trade with the University and any other matter which might reasonably be thought by others to influence their actions or decisions as employees.

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- A member of staff who is in doubt whether a declarable interest exists should consult the Director of Finance.

3.6. OVERNIGHT ACCOMMODATION

3.6.1 The authoriser should check that:

- it was necessary for the employee to stay overnight given the distance travelled and the time that the journey commenced or finished.
- the standard of accommodation chosen was reasonable in relation to business needs and the employee's circumstances.

3.6.2 The guideline rates will be provided through the university's web page <http://www.aber.ac.uk/en/finance-office/information-for-staff/travel/> and will be reviewed from time to time by the University Executive Group.

3.7. PERSONAL INCIDENTAL EXPENSES

3.7.1 If an employee is required to stay away overnight on business for tax purposes personal incidental expenses can be claimed up to £5 per night on average in the UK and £10 per night on average overseas. These expenses include private telephone calls, laundry, newspapers etc. This allowance is the maximum permitted by HMRC and if, for example, an employee is away for 4 nights and claims £21 (as opposed to £20), the full amount would be liable to tax and National Insurance.

3.8. MEALS (OTHER THAN ENTERTAINING)

3.8.1 If an employee is away from their permanent workplace on a business journey, the guideline rates will be published on the university web pages and will be reviewed periodically the Executive.

3.9. ENTERTAINING

3.9.1 General

This section of the manual sets out the University's policy in relation to entertaining expenses incurred in the course of your duty as an employee of the University.

In addition, employees should be aware of the tax consequences before incurring any entertaining expenses. Inappropriate entertaining costs may lead to a tax charge on the University or the employee personally (via the P11D form returned annually to HMRC). Any member of staff concerned with whether they have a benefit which is taxable to contact the Finance Department Technical Manager for further guidance.

3.9.2 Business entertaining

Entertaining expenses can only be described as "business" entertaining if they have genuinely been incurred wholly for the furtherance of the University and it has been incurred as a reward for business contacts, or as part of a reciprocal arrangement. In addition, if more employees are in attendance than /clients including guest speakers or suppliers, HMRC may take the view that the entertainment is not genuine business entertaining. HMRC state that business entertaining includes hospitality of any kind and also expenditure on gifts.

In accordance with the above, necessary business entertaining costs must be supported by proof of payment, i.e. invoices or VAT receipts.

Generally where employees entertain third parties (e.g. customers or suppliers) the total cost of the entertainment must be identified and coded as business entertaining.

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The following information must be shown on the expense claim form or invoice or purchase card reimbursement form if applicable to differentiate business entertaining from staff entertaining (see below):

- The name(s) of the attendees (including employees present – typically, this should be no more than 1 employee to every customer/Client including visiting guest speakers unless with specific prior approval from the Finance Department)
- The organisation which they represent; and
- The purpose of the entertaining

Costs for alcoholic beverages should be kept to a reasonable level, as a rule, half a bottle of wine (or equivalent) per person, with a meal would be considered reasonable. Excessive costs relating to alcohol will not be reimbursed.

Service charges and tips up to a maximum of 12% are allowable.

The cost of entertainment should be kept at a reasonable level consistent with the purpose of the entertainment. Costs more than 50% higher than the normal University Subsistence rates will not normally be paid unless the Director of Finance gives specific approval.

No tax or National Insurance liability will arise for the employee and the University in respect of entertaining expenses by adherence to these rules.

3.9.3 Staff entertaining

Entertainment for University staff (i.e. not involving third parties) must not be charged to the University and is not reimbursable in whole or in part unless prior approval is given by a Pro Vice Chancellor or the Vice Chancellor.

Where a department arranges an Away-day or similar to discuss departmental business/plans, reasonable expenditure for refreshments is allowed. When the claim for reimbursement or a supplier invoice is submitted, it must be accompanied by an agenda and a full list of delegates, and wherever possible notes of the meetings or reports about sessions. Similarly, legitimate “working lunches” are acceptable provided that claims can be supported by agendas and either meeting notes or reports from sessions.

3.10. GUESTS ACCOMPANYING STAFF

3.10.1 If guests accompany University staff on business trips, the costs associated with the guests must be reimbursed by the employee.

3.10.2 The only exception to this rule is if the guest accompanies the employee because:

- the employee is too ill to travel alone; or
- the guest has a specific skill or qualification which stops the University from having to pay someone to perform a specific duty, for example a foreign language which enables the guest to act as a translator.

3.10.3 Where an employee is working abroad for periods in excess of sixty consecutive days, up to two flights per tax year for the spouse and family may be paid tax free.

3.11 PERMANENT WORKPLACE

3.11.1 All University employees have a permanent workplace. Broadly, this will be where an employee works regularly.

3.11.2 No University staff are home based unless this has been specifically agreed in writing. Therefore, expenses

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should only be claimed from home in the circumstances set out under 3.17.

3.12. DETACHED DUTY/SECONDMENT

- 3.12.1 If an employee works away from his or her permanent workplace for a period which is not expected to and does not exceed 24 months, he or she can claim for travel and subsistence expenses.
- 3.12.2 If it is known that the secondment will last for more than 24 months all of the expenses will be liable to tax and National Insurance and need to be paid through the payroll.
- 3.12.3 If the secondment unexpectedly lasts for more than 24 months, the expenses will become taxable from the date that it is known that the secondment will exceed 24 months.
- 3.12.4 If the secondment is for the whole or the majority of the period of the employment, the expenses will also be liable to tax and National Insurance, for example, if an employee resigns part way through the secondment.

3.13 TRAVEL

- 3.13.1 The authoriser must be satisfied that the journey is business related and that there is no claim for any private element to the travel.
- 3.13.2 Persons travelling overseas on University business must notify the insurance section of the Finance Department (who administer the University's insurance arrangements) in advance to ensure the necessary travel insurance is in place.
- 3.13.3 Employees should provide full details of the dates of absence from the University and the destination and purpose of each visit.
- 3.13.4 When any travel involves the use of scheduled flights the bookings for travel and accommodation must be made via the University's preferred supplier as advised on the procurement internet pages <http://www.aber.ac.uk/en/finance-office/procurement/>. In other cases the preferred supplier should be given the opportunity to quote.
- 3.13.5 Full fare First Class rail travel is only permitted for the Vice Chancellor. Advance first class tickets are allowable at Accountable Budget Controller and Executive Group level. All other rail travel should be standard class and be booked in advance whenever possible.
- 3.13.6 Business class flights are only available to staff members for intercontinental flights. No first class tickets are allowed. Business class tickets must be authorized in advance of travel by the Vice Chancellor or the Director of Finance.

3.14. BUSINESS MILEAGE AND CALCULATION OF ALLOWANCE

- 3.14.1 The basic principle to be applied when calculating mileage is that a staff member should not gain or lose by using their vehicle for official business. If they incur additional mileage they should be compensated for that but if they travel less than they would normally travel then they should not be able to charge for that mileage.

The concept of "normal place of work" is important here. For some staff it will be their home address but for the vast majority it will be Aberystwyth.

- 3.14.2 When travelling by private vehicle on official business mileage for all journeys will be paid for the shortest possible route only.
- 3.14.3 When travelling from normal place of work to a place(s) away from normal place of work by private vehicle on official business the mileage incurred is reimbursed in full at the standard rates.

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- 3.14.4 When travelling from home to a place(s) other than normal place of work and return home by private vehicle on official business standard rates are payable for the mileage incurred less the distance of travel normally incurred in travelling to normal place of work and return home.
- 3.14.5 When travelling from home to a place(s) other than normal place of work and return to normal place of work (or vice versa) by private vehicle on official business standard rates are payable for the mileage incurred less the distance of travel normally incurred in travelling to normal place of work.
- 3.14.6 Claims should be submitted within 3 months of the completion of the journey. Any claims submitted outside this limit will be disallowed.

3.15. PRIVATE CARS

- 3.15.1 Compensation for mileage and other expenses incurred by members of staff in connection with approved University business will be as set by the AUAU Executive and published on the University website at <http://www.aber.ac.uk/en/finance-office/information-for-staff/travel/>.

Compensation for mileage and other expenses incurred by members of the University Council and associated committees in connection with approved University business will be as set by the Council, after consultation with the Vice Chancellor, and published on the University website.

- 3.15.2 If an employee uses their own vehicle for business, he or she must ensure that it is road-worthy and that the motor insurance policy includes business cover. The University reserves the right to check insurance policies and driving licenses annually to ensure drivers are correctly insured and qualified to drive.
- 3.15.3 For journeys over 100 miles employees should consider the use of hire cars typically via framework agreements. In these circumstances the employee is also advised to contact the Technical Manager, Insurance Services and VAT Compliance to ensure that appropriate insurance arrangements are put in place.

3.16 RECORDS/DETAILS REQUIRED ON EXPENSES CLAIMS

- 3.16.1 Employees should provide sufficient detail against a claim i.e. the starting point, all destinations, the finishing point and the purpose of each journey, so that compliance with these rules can be checked by both the authoriser and the payment processor.
- 3.16.2 Claims with rounding of mileage, for example to the nearest five/ten miles, should be rejected. However, provided there is a valid business reason, business mileage does not need to be restricted to the shortest route. For example, a claim can be made for a longer but faster route.

3.17 HOME TELEPHONE BILLS

- 3.17.1 Employees who use their home or mobile telephones for business use are entitled to reclaim the costs of business calls, as long as they can prove that the calls are University related.
- 3.17.2 Certain employees are entitled to reclaim 100% of the bill if a second dedicated business line is installed. This expenditure requires to be authorised by the Senior Budget Manager. In such cases, the dedicated line must be in the name of Aberystwyth University.
- 3.17.3 In either of the above circumstances no tax or National Insurance will be due.

3.18. UNIVERSITY PROVIDED MOBILE TELEPHONES

- 3.18.1 It is recognised that there will be occasions when employees need to make short, personal calls on University telephones, fixed lines, mobiles, PDAs and similar devices in order to deal with occasional and urgent domestic crises. Equally, it is legitimate to receive personal calls about domestic crises and arrangements, and occasional, short, non-urgent calls can be received providing they do not interfere adversely with work requirements.

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Section 3: Expenses Manual

3.18.2 The procurement of mobile phones should utilise supplier agreements accessible through Information Services and in accordance with any prevailing University Mobile Phone Policy (See Information Services website <http://www.aber.ac.uk/en/is/email/mobiles/>).

3.19 USE OF UNIVERSITY ASSETS

3.19.1 If the University provides assets or equipment to an employee for private use the following information must be supplied to the Payroll Manager

- name of employee;
- description of asset and
- value period of use.

3.19.2 The period of assessment is 6 April to 5 April. Computer equipment loaned to employees where the total value of the loan is less than £5000 in the tax year is currently exempt. For more information on this contact the Payroll Manager.

3.19.3 In such circumstances the user will be liable for any loss or damage and all such equipment must be covered by the individual's home contents insurance policy.

3.20 USE OF POOL VEHICLES

3.20.1 Employees should aim to use University pool vehicles where possible. Details of who is authorised to drive the vehicles is included in the University Pool Car and Van Policy document which is available from the Finance Department. Applications can be made to become an Authorised Driver using the forms <http://www.aber.ac.uk/en/finance-office/information-for-staff/forms/>

3.20.2 Employees must note the mileage used in the University vehicles and the purpose of that journey.

3.21 CAR PARKING

3.21.1 Employees are required to make own arrangement for car parking at their place of work. Parking permits can be purchased from Campus Services using the following link <http://www.aber.ac.uk/en/parking/staff/>.

3.22 EDUCATIONAL COURSES AND CONFERENCES

3.22.1 An employee will not be liable for tax in respect of training courses which are designed to impart, instil, improve or reinforce any knowledge, skills or personal qualities likely to be useful to, or better qualify the employee for the job he or she does, or may do, for the University.

3.22.2 In any of the above circumstances, the cost of course fees, essential books and any additional travelling and subsistence expenses incurred as a result of attending the course will not be taxable.

3.22.3 Any part of the expenditure included in the following categories will result in a tax liability for the employee:

- entertainment or recreation unconnected with the training;
- to reward the employee for performing his or her duties;
- as an employment inducement unconnected with the training.

3.23 PERSONAL SUBSCRIPTIONS

3.23.1 In general, personal subscriptions to professional bodies and academic/learned societies are a personal liability and should not be charged to University funds.

3.23.2 Subscriptions to professional bodies, academic associations and societies may be charged to the University in two circumstances:

1. Where the Head of Department has deemed that individual membership is necessary for the purposes of course

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Section 3: Expenses Manual

- accreditation or research functionality. The Senior Budget Manager must authorise such a payment request.
2. Where membership is corporate or where the individual is a member because they are representing the University in their role. Examples of this are Universities UK, HE Liaison Officers Association, HE associations of heads of academic or professional services departments.

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Section 4: Nolan Principles

Section 4: Nolan Principles of Public Life

4.1. The 'Nolan Principles' code of practice has been written with regard to the seven principles of public life identified by the Nolan Committee in their First Report on Standards in Public Life in May 1995 and subsequently endorsed by Government. Aberystwyth University actively promotes and strives to adhere to the principles set out below and expects all of its officers and staff to do the same.

4.2. The Seven Nolan Principles:

Selflessness

Holders of public office should take decisions solely in terms of the public interest. They should not do so in order to gain financial or other material benefits for themselves, their family, or their friends.

Integrity

Holders of public office should not place themselves under any financial or other obligation to outside individuals or organisations that might influence them in the performance of their official duties.

Objectivity

In carrying out public business, including making public appointments, awarding contracts, or recommending individuals for awards or benefits, holders of public office should make choices on merit.

Accountability

Holders of public office are accountable for their decisions and actions to the public and must submit themselves to whatever scrutiny is appropriate to their office.

Openness

Holders of public office should be as open as possible about all the decisions and actions they take. They should give reasons for their decisions and restrict information only when the wider public interest clearly demands.

Honesty

Holders of public office have a duty to declare any private interests relating to their public duties and to take steps to resolve any conflicts arising in a way that protects the public interest.

Leadership

Holders of public office should promote and support these principles by leadership and example.

Financial Procedures

Section 5: Conflicts of Interest

Section 5: Conflicts of Interest Policy

Preamble

- 5.1 Aberystwyth University considers that the establishment of links between members of the Council and its committees, the University Executive Group, the University's senior staff, and outside bodies is in the public interest and benefits the University in terms of achieving its objectives. It is, however, possible that such links in some circumstances may give rise to conflicts of interest. In this context, the University requires Council members, committee members, and staff to avoid financial, ethical, legal, or other conflicts of interest. All such actual, perceived or apparent and potential conflicts must be disclosed.
- 5.2 Any activity or action is considered a conflict of interest when a Council member, committee member or member of staff has an interest, or incurs an obligation, in a business, organisation, transaction, individual, or professional activity which could unduly interfere with the proper discharge of their duties as a Council member, committee member or member of staff of the University. Conflict of interest exists when a Council member, committee member or member of staff personally benefits, or could be perceived to benefit personally, from an activity, transaction or interaction with an individual or business. A member has a perceived or apparent conflict of interest if there is a reasonable perception, which a reasonably well informed person could properly have, that the Council member's, committee members' or staff member's integrity or ability to exercise an official power, or perform an official duty or function is likely to have been affected by his or her private interest. Perceptions of a conflict not only arise in relation to Council members', committee members' or staff members' interests or obligations in businesses, organisations, transactions and individuals doing business with the University. They may also arise where the member is a purchaser of services from the University.

Application

- 5.3 This policy applies to all Council members, committee members, senior members of staff and other staff as defined below. This policy should be read in conjunction with the "University's declaration of interest form" and "register of interests".

Other staff covered by the policy

- 5.4 All members of University staff are required to disclose any perceived or apparent and potential conflicts. Any member of staff who has not completed a declaration of interest will be considered to have made a 'NIL Return'. Staff will be requested to update their Conflicts of Interest disclosure on a bi-annual basis.

Scope of the policy

- 5.5 The members and staff covered by this policy have a duty to act in the best interests of the University, and in accordance with the University's Statutes and Ordinances and Regulations for the Council and its committees.
- 5.6 An actual, perceived or potential conflict arises when an individual's business, personal or family interests and/or loyalties conflict with those of the University. Such problems can inhibit objective discussion and debate. They may also result in decisions being made that may not be in the interests of the University and give the impression that the University has acted improperly.
- 5.7 The aim of the policy and its associated documentation is to protect the University and the members/staff involved from any appearance of impropriety.

The Declaration of Interest

- 5.8 There is a general obligation on all members of the Council, members of its committees and University staff to disclose at the earliest practicable opportunity any financial or other beneficial interests (including substantial gifts or hospitality – see below) that they or a family member or any organisation in which they hold office or employment, may have in any transaction under consideration between the University and a third party. The circumstances in which such a declaration is appropriate are:
- when the Council or any of its committees has business which is materially relevant to those interests; or
 - when in the course of a meeting the member becomes aware that they have or may have a financial or

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Section 5: Conflicts of Interest

other beneficial interest in the specific item of business to be discussed or decided upon.

- 5.9 These circumstances will vary from case to case, and between the Council members, the committee members and senior members of staff. The Council members and committee members by definition will not be directly involved in making management decisions but are likely to have links with many of the organisations with which the University has dealings. The extent to which these dealings constitute actual, potential or perceived conflicts of interest in the context of a Council member's and/or a committee member's participation in the Council's business will also vary. The Council's members and committee members should apply the test of 'reasonableness' outlined in paragraph 5.2 above in deciding whether a potential or perceived conflict exists. The proper manner of indicating an actual, potential or perceived conflict of interest is to inform the Chair or Clerk to the relevant Committee in advance of the meeting or to draw it to the attention of the Chairman of the meeting once the member becomes aware of a conflict during the course of discussion. The individual should then withdraw and take no further part in the subsequent discussion. Members may not participate in decision-making processes that affect their own interests.
- 5.10 In the case of staff they should report the conflict as soon as is practicable to their line manager.
- 5.11 If a conflict arises, or if a decision is taken under a conflict of interest, it will be recorded by the Clerk to the relevant Committee and the following reported in the minutes of that meeting:
- the nature and extent of the conflict (including the nature of the member's relationship with the business, organisation, transaction, individual or professional body, where appropriate);
 - a summary of the associated discussion; and
 - a record of the actions taken to manage the conflict.

Acceptance of Gifts

- 5.12 Acceptance of gifts, entertainment, travel, and services for personal use from people or companies who do business with the University could impede the objectivity of the Council member, committee members and members of staff, and create a conflicting obligation to that person or company, contrary to their obligation to the University.
- 5.13 The receipt of a gift in the course of performing official duties raises an issue of ethical conduct if the acceptance of the gift places the member in a real or apparent conflict of interest situation. In this context, the most significant feature of any gift is its extrinsic value. Any value above that which is nominal may be perceived to suggest an ulterior motive. The safest approach is to allow only the receipt of gifts valued at a nominal amount. Other gifts offered must be declined. For further advice on the acceptance of gifts please see section 10.

The Register of Interests

- 5.14 The Clerk to the Council maintains a register of interests declared by members of the Council and its committees. This register will consist of information provided by each member, to be returned annually in a standard format issued by the Clerk. A summary version of the register shall be published on the AU governance website. New Council and committee members on appointment will be asked by the Clerk to complete the declaration of interests form.
- 5.15 The Pro Vice Chancellor Student and Staff Services maintains a register of interests declared by senior officers of the University (Accountable Budget Controllers and Senior Budget Managers). The register will consist of information provided by each officer and be returned annually in a standard format issued by the Executive. New senior officers on appointment will be asked by the Pro Vice Chancellor Student and Staff Services to complete the declaration of interests form.

Data Protection

- 5.16. All the information provided will be covered by the principles of the Data Protection Act, 1998 and/or any amending legislation. This data will only be used to ensure that the individuals covered by the policy act in the best interests of the University and will not be used for any other purpose.

Monitoring

- 5.17. The register of interests will be randomly checked against the award of contracts to confirm the effectiveness of

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Section 5: Conflicts of Interest

the register and policy. This policy will be reviewed in line with the periodic review of the Financial Procedures.

REGISTER OF INTERESTS – MEMBERS OF COUNCIL AND SUB-COMMITTEES/COMMITTEES

1. *Aberystwyth University is a publicly funded body to which the highest standards of accountability and probity apply. To ensure that, as far as possible, no conflict of interests – actual or perceived – arise, the institution maintains a Register of Interests for members of Aberystwyth University’s Council and sub-committees.*
2. *Any interest, financial or otherwise, which is likely (or would, if publicly known, be perceived as being likely) to interfere with the exercise of a committee member’s independent judgement should be disclosed to the institution. The interests will then be recorded in the Register of Interests. This Register enables committee members to disclose relevant business interests in a manner which is open and transparent and demonstrates to the public that such interest have not influenced the institutions decision-making process. You are reminded that the Register is open to public inspection and a summary version of the Register will be published on the Aberystwyth University website.*
3. *While members are asked to verify their declared interests on an annual basis, you are asked to give notice, as and when appropriate, of any subsequent changes in your personal circumstances during the course of the academic year that could materially affect your position as a member of a committee. The University’s reasonable expectation is that the information you provide is up to date and correct and it is your responsibility to inform the University of any changes.*
4. *Where there is no information to record against a heading, please insert ‘NIL’.*
5. *Please complete this form and return to University Secretary, Governance Unit, Planning Department, Aberystwyth University, Visualisation Building, Penglais, Aberystwyth, SY23 3BF / secretary@aber.ac.uk.*

NAME IN FULL.....		
1.	<p>Employment / Business Interest</p> <p>Name of employer or business and nature of work or business</p>	
2.	<p>Directorships, Partnerships</p> <p>Name of Company, firm or other body and nature of business</p>	

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Section 5: Conflicts of Interest

3.	<p>Shareholdings</p> <p>Name of company and nature of business of any company in which you hold more than 1% of the shares of the company</p>	
4.	<p>Interest in Land or Property</p> <p>Address or description of property or land where you believe there may be a potential conflict with the University or its operations.</p>	
5.	<p>Other information</p> <p>Details of any interest which is likely to be directly relevant or would, if publicly known, be considered to be directly relevant to the interests and business of the University.</p> <p>Such interests may include:</p> <p>memberships of associations or professional bodies;</p> <p>trusteeships or any other similar kind of special relationship;</p> <p>kinship or close family or other relationship with anyone likely to have direct interests in matters within the purview of Aberystwyth University;</p> <p>retainers, consultancies and sponsorship on behalf of anybody or person(s).</p>	

I declare that the above information, which is supplied by me, is correct and complete to the best of my knowledge and belief.

Signed..... Date.....

Financial Procedures

Section 6: Commercial Ethics Policy

Section 6: Commercial Ethics Policy

- 6.1 In the interests of probity, openness and public accountability, staff and members of the University must ensure that, in all dealings with commercial partners, members of the public, colleagues, etc., the interests of the University are paramount, and that personal or family gain, or the perception thereof, must be avoided.
- 6.2 The University will not do business with companies, organisations, individuals, etc., that knowingly seek to circumvent its procurement, tendering, recruitment policies, etc., or that offer or provide any inducements whatsoever to the University's staff and members. In the event of any breach of this condition, the University shall, without prejudice to any other rights it may possess, be at liberty forthwith to terminate the relationship with the organisation or individual concerned and to recover from it any loss or damage resulting from such termination. Similarly, should any employee, member or any other agent from the University be found to have knowingly breached these conditions, the University shall, without prejudice to any other rights it may possess, be at liberty to terminate the contract or relationship with the individual/s concerned and to recover any losses which the University may have incurred as a result of such breach of these conditions.
- 6.3 All University standard tender and contract documentation should include the following anti-corruption clause:
- 'The Supplier shall not knowingly give, provide, or offer to the University's staff, members and agents any loan, fee, reward, gift or any emolument or advantage whatsoever. In the event of any breach of this condition, the University shall, without prejudice to any other rights it may possess, be at liberty forthwith to terminate the contract and to recover from the Supplier any loss or damage resulting from such termination.'*

Financial Procedures

Section 7: Money Laundering

Section 7: Money Laundering

7.1 The University shall comply at all times with the Proceeds of Crime Act (2002) and any other regulations on suspected money laundering. Should staff have cause to suspect that any transaction with the University may be a cover for such activity, they must inform the Director of Finance without delay. Money laundering is defined as **any** transaction which involves handling the proceeds of crime.

7.2 Possible signs of money laundering include:

A person or company makes a large cash payment to the University, but fails to provide proper evidence to confirm their identity and address.

A person(s) or company doing business with the University lacks proper paperwork. (Examples may include invoices that exclude VAT, fail to quote a VAT number or invoices issued by a limited company that lack the company's registered office and number. Such information can be verified on the Companies House website, www.companies-house.gov.uk).

A person(s) or company attempts to engage in "circular transactions", where a payment to the University is followed by an attempt to obtain a refund from the University's accounts. (This may occur where a student pays a significant sum in fees, and then withdraws and seeks a refund).

Unusual or unexpected large payments are made into the University's accounts.

7.3 Please note that the list above is not exclusive, and money laundering takes many forms.

7.4 The Director of Finance shall report all suspected incidents of money laundering to the competent authorities. Under the Proceeds of Crime Act, this requires a Suspicious Activity Report to be forwarded to the National Criminal Intelligence Service.

Financial Procedures

Section 8: Cash Handling

Section 8: Cash Handling

8.1 Accountability

Many incidents where monies have gone missing at the University occurred because proper procedures have not been followed, for example where cash has been left unattended and not locked away or safe keys left in desk drawers. In these incidents, several people have potentially had access to the funds, but inadequate procedures and lack of accountability has often rendered it impossible to identify who may be responsible for the loss. In these circumstances, suspicion unfairly falls upon everyone.

One of the key principles of cash handling is that proper accountability is maintained at all times in the cash handling process. It must be possible, at every stage of the process, to establish which staff are responsible for accounting for monies under their control. In the event that monies are found to be missing it should be possible to identify which member of staff was responsible for the cash at the time it was "lost".

8.2 Basic Security

Administrators or relevant appointed members of staff in Departments and elsewhere should be aware of all locations within their area where cash is received or held. It is helpful to review these regularly and to consider if they are all in fact necessary. Generally, errors can occur where staff that have other duties are required to handle cash on an occasional basis. It is often best if cash handling can be focused on one or two staff who can develop the expertise required.

Line Managers must make clear to staff that they are accountable for cash and cheques under their control, and are responsible for ensuring that monies are held securely at all times. No other staff should have access to these monies - not even for brief periods. Cash should never be left unattended, for however short a period of time.

When cash is physically transferred between officers, the monies handed over should be counted and checked at the time of the transfer and a discharge signature obtained from the recipient. During this process, the monies should be checked and agreed in the presence of both officers.

All monies received within departments from whatever source must be recorded by the department on a daily basis together with the form in which they were received.

Money must be paid to the cashier and custody of all cash holdings must comply with the requirements of the University's insurers.

No deductions may be made from any cash collected on behalf of the University prior to paying in to the cashier.

Personal or other cheques must not be cashed out of money received on behalf of the University

8.3 Safes

The level of security will depend upon individual circumstances. Where income is collected the level of security required needs to take into account the amounts of cash involved. If substantial amounts of monies are involved it may be necessary for monies to be transferred at intervals to a safe during the day.

In Departments, Halls and other establishments where there are safes, all other monies such as floats and petty cash impress should be kept in the safe when not in use. It may also be helpful to keep certain monies, such as petty cash floats, in a separate cash boxes within safes.

Security is enhanced when monies are kept in a safe and the practice of keeping cash in drawers, desks and filing cabinets etc. should be actively discouraged. However, for this to be effective, proper control of keys to safes, cash boxes, etc. must be exercised at all times. Wherever possible, specified individuals should be made personally

Financial Procedures

Section 8: Cash Handling

responsible for individual keys.

Good practice dictates that the number of keys and officers having access to safes and their contents should be kept to the minimum required for operational requirements. Access to safes must always be restricted and authorised key holders must not hand safe keys to other officers to allow temporary access to safes, for however short a period of time.

Under no circumstances should safe keys be left in desk drawers, filing cabinets etc. Negligent handling of cash may invalidate the University's insurance. Should any safe or office keys be lost, the matter must be reported to the relevant manager, who must make arrangements for locks to be changed as soon as possible. No information relating to the premises or location of safes should be attached to safe keys, in case they fall into the "wrong hands".

Details of all safes should be communicated to the Insurance Office as soon as possible so that insurers are aware of their locations and their security.

In the event of any loss being discovered, the circumstances must be reported to the Insurance Office and Director of Finance.

8.4 Cash Office

Certain guidelines are required for the handling of cash at the main University Cash Office:

- cash shall be counted out of sight of the general public.
- cash should be counted by authorised personnel only, counter closed at 4pm daily to cash up and reconcile.
- receipts must be issued where cash is received.
- cash and cheques held overnight before banking must be held in a safe or lockable cupboard/drawer or cash boxes pending the banking.
- personal cheques (staff and public) must not be exchanged for cash.
- cash handlers should have suitable banking bags for counting and cashing up the money.
- cash should never be left unattended or in an unattended environment.
- at the earliest possible date, a reconciliation ought to be made between the cash banked and income summaries. Where practical, this ought to be undertaken by a person independent of the counting and cashing up of the money.
- any discrepancies should be recorded and approved/investigated by the Team Leader.
- cash should be collected by the approved Security Company in accordance with the agreement in place.
- lone working – the office should be closed if only one member of staff is on duty and there are no other staff to cover.

8.5 Guidelines for Transporting Cash

8.5.1 Introduction

The movement of cash involves significant risks, both to the safety of staff and University funds. Cash is defined as notes and coins, although when "cash" is transported this will often also include cheques received in payment and possibly supporting documents such as credit card vouchers.

The University's insurance policy stipulates the following requirements for moving cash across the campus or other buildings–

up to £3,000 - 1 fully mobile person;

a minimum of two able bodied people are required to transport cash amounts between £3,000 and £10,000; and,

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in excess of £10,000 - security carrier

Staff should seek the advice of the University's Cash Office and Security Services on issues relating to the secure custody and transportation of cash and other valuables.

8.5.2 Handling of Income

Cash and cheques received should be kept safely and paid into the bank at the first opportunity. Avoid accumulating large sums, as this may exceed insurance limits, attract criminals and loses bank interest.

Whenever possible, at least two people should take significant sums of cash to the Cash Office. Staff based away from the Penglais campus should travel by bus or car. Cash should be concealed when in public places.

Never establish a routine of going at exactly the same time each week, and avoid trips with cash becoming common knowledge. You never know who is listening.

Cash must never be sent in the post or using the internal mail service.

8.5.3 Security Company

The University has a contract with a security company for the transportation of cash. For large or regular cash movements, seek the advice of the University's Cash Office. It may be possible to arrange for cash to be collected and delivered by the nominated Security Company.

8.6 Guidelines for Operating Tills & Cash Registers

8.6.1 Introduction

Any area where significant sums of cash are received on a regular basis should consider obtaining a cash register (till). When average daily takings exceed £100 or weekly takings are over £500, the use of a till is strongly advised.

There are many types of cash register available, with a wide range of facilities. Ideally, all cash registers should have the ability to record the staff using them and to identify which member of staff processed an individual transaction.

8.6.2 Basic Security Levels

To give a minimum level of security, a cash register must have:

Two Till Rolls

Receipts: One roll produces a receipt that is given to the customer

Audit roll: This is housed within the till, and is retained for audit purposes. It must record every transaction and show each X and Z total (see below).

The audit roll should only be removable using a key (held by the Supervisor). However, the most recent transactions should be visible to the operator, and it should be possible to write short notes (such as initials) on the audit roll.

X and Z Totals

The cash register should also be able to produce, printed out on a receipt and recorded on the audit roll, two running totals:

An "X reading": the total rung through the till so far that day,

A "Z reading": the final total for the day.

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The cash register should record both the date, and ideally the time, when both an X and Z reading was taken. Each Z reading should also have a unique number, increasing by one from the previous reading. After a Z reading is taken, this “zeros the till”, so a subsequent X reading records only takings since the last Z reading.

The above features have been available on tills for many years, and are not limited to modern electronic models. Any till that does not have them should be replaced.

8.6.3 Till Management

One member of staff should be appointed as Supervisor of the till(s) in their area. This person should be of senior status to the till operators, and should not usually work the tills themselves. A deputy should be appointed to cover absences from annual leave, sickness etc.

The Supervisor should, as well as generally managing the operation of the tills, undertake such roles as taking Z readings, cashing up and authorising refunds and “no-sales”.

Linking Staff to Transactions

Records should exist to show which member of staff used the till at a particular time and date and ideally who undertook a particular transaction. How this is done depends on the sophistication of the tills used.

In a traditional till, the member of staff on duty at the start of business should check that the till has been zeroed (by taking an X reading), and sign the top of the audit roll. The till will have a key, and whenever the employee is away from the till, even for a few seconds, it must be locked.

If the employee hands over the till to a colleague, an X reading should be taken and the two employees sign the audit roll to mark the hand over. Ideally, the till should be cashed up whenever this happens. Alternatively, a special form can be used to record when the till was handed over.

Where several employees use one till, it should be of sufficient sophistication that the person using the till for a particular transaction is recorded on the audit roll. This can be done in several ways depending on its design, for example by giving staff a personalised key that the till recognises.

Staff must never pass their key to another person without permission.

8.6.4 Cashing Up

This must be done as soon as possible after the close of business each day, although it may be done more often or earlier if an outlet is very busy, or this is required for any other reason. The cashing-up process will normally involve the following:

Removal by the Supervisor of the cash drawer from the till to a secure place, ideally a dedicated cash office.

Taking of a Z reading by the Supervisor, and taking the Z receipt and the audit roll with the cash drawer.

Two members of staff should then count the takings, and reconcile them to the total received as recorded by the Z reading and audit roll.

8.6.5 Financial Records

The actual and recorded takings, any discrepancy (“unders/overs”), and Z reading number (i.e. the number of Z readings taken) should be recorded in a permanent register by a person independent of the machine operator. The Z reading number should be checked against the previous day’s reading to ensure that there is no gap. Both members of staff who counted the takings must sign the register.

Where takings are divided between cash, cheques and debit/credit cards, the total paid using the various types of

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payment method should be recorded separately.

The register, Z reading receipt and audit roll should all be stored safely. These are permanent financial records that must be retained for at least three years.

8.6.6 Discrepancies

Whenever discrepancies are found e.g. till shortages ("unders/overs"), or Z number discrepancies, the member of staff should inform their line manager without delay. The line manager should inform the head of their unit and the Director of Finance immediately should he/she have reasonable grounds to suspect a financial irregularity, or fraud or that the incident is not isolated in nature.

8.6.7 Security

The takings must be kept in a secure, locked safe until collection by the Security Company, or transportation to the Cashier's Office.

8.6.8 Refunds and "No Sale"

Each area should have a policy on refunds, but the basic rule is that a Supervisor must approve all payments out of the till. All such payments must be recorded when made, and included in the reconciliation at close of business. A record must also be made of any occasion when "no sale" is used to open the till.

8.6.9 Deductions

With the exception of properly authorised refunds, no cash should be removed from the till at any stage. Similarly, at the cashing-up stage, all takings must, without any deductions, be handed over to the Security Company or transported to the Cash Office. The only exception is the till float, which should equal that received at the start of business.

Cash must never be deducted to replenish a petty cash float, pay casual staff wages or for any other purpose.

8.7 Petty Cash

Where a single item is for less than £20 it can be paid from departmental petty cash. The payment must be supported by receipts or vouchers. Payments for casual work should be paid via the Finance Department payroll section and not from petty cash. Reimbursement of eye test costs should be made centrally after completion of the appropriate form. Add hoc income e.g. private telephone calls can be paid in to the petty cash account where the individual item has a value of less than £5.00. Where the payment is for more than £5.00 then it should be paid to the University cashier or paid directly in to the bank.

A record of expenditure should be kept in a bound book. Details recorded on the book should include:-

- Name of staff member making the claim
- Date of reimbursement
- Amount
- Brief description of the nature of the claim

Requisitions for reimbursement must be sent to the Director of Finance, together with appropriate receipts or vouchers and the expenditure book. The expenditure book should be signed by the claimant when a claim is made and by a member of the Finance Department staff when the claim is checked. The amount claimed should be reconciled to the original advance on the claim form. Claims should be submitted before the total amount held has been expended, in order to retain a working balance pending receipt of the amount claimed. The claim form should be signed by one of the approved departmental signatories.

The member of staff granted a float is personally responsible for its safe keeping. The petty cash box must be kept

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Section 8: Cash Handling

locked in a secure place in compliance with the requirements of the institution's insurers when not in use, and will be subject to periodic checks by the head of department or another person nominated by him or her. Staff are not allowed to "borrow" from petty cash either for their own use or to fund other expenditure within the University.

8.8 Payment Card Industry Data Security Standards Compliance

8.8.1 Overview

The procedures outlined below deals with the controls required over the transmission, processing, and storage of all data and information received in respect of all card receipts accepted by the University.

Please refer to the 'Information Security Policy – Responsibilities of Staff' at <http://www.aber.ac.uk/en/infocompliance/policies/securitystaff/>

The management and control of data and information received in respect of cards at the University involves departments and the Finance Department.

Key controls for controlling card data are as follows:

8.8.2 Receiving or obtaining card data

Card data should be received by appropriate methods only; preferably using face-to-face (chip & pin) transactions, where the customer is present and able to enter their card details directly into the card terminal; or via the online payments system.

Receiving card payments, where the customer is not present, is discouraged, but if it is necessary, the preferred method is to receive the card details by phone and enter them immediately into the card terminal.

Card details must never be sent by email or by other electronic method, or be entered into any online payment system other than that approved by the University.

Telephone recording systems must not keep a record of card data e.g.eg on tape and must be destroyed as soon as practicable or seek software to mask the card information.

Do not request card data via whatever form by non-secure means i.e. internal mail or e-mail.

8.8.3 Transmitting card data (to remotely held card terminals)

Where personal card data has to be transmitted (from order taking / receiving location to card processing location), the card data must be recorded on 'card authorisation forms' and the forms must be kept secure at all stages of the transmission, these forms should have the card data shown at the bottom of the form where it can easily be removed and destroyed after authorisation.

Sending card authorisation forms to the Central Cash Office must be by hand.

Where 'card authorisation forms' are to be transmitted to card terminals held in departments, they must be hand delivered. Card data must be treated as if it were cash.

Do not transmit 'card authorisation form' data via email or any other electronic method, or send the forms by internal or external post.

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8.8.4 Storing card data

Sensitive card data such as card numbers and start/expiry dates and the security number on the back of payment cards must never be retained after being used for processing.

All records of card security details or authentication data must be destroyed. The bottom of the 'card authorisation form', where such card details are recorded, must be cut off and shredded or destroyed by other means.

No track data from the magnetic stripe, magnetic stripe image on the chip, or elsewhere (card electronic data) must be stored.

The rest of the 'card authorisation form', and till rolls supporting card transactions, can be stored, as long as they are held with access restricted to authorised personnel only, which must be reported to the Finance Department.

All past records must be reviewed to ensure no card data has been held unless stored securely with restricted access for specific needs as agreed by the Finance Department. If no such agreement is in place then please seek guidance immediately.

8.8.5 Card data received and processed online

Only the University approved online payment facility must be used for payment by card online.

EPOS systems must be compliant with PCI DSS requirements and this policy, where applicable.

Do not transmit card data over the University network.

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Section 9: Disposal of Assets

Section 9: DISPOSAL OF ASSETS

- 9.1 All sales of Land and buildings shall be approved in the first instance by Finance and Strategy Committee with the final approval being granted by Council. The Financial Regulations set out a checklist of the documents required to be submitted to Finance & Strategy Committee.
- 9.2 Furniture & Equipment may be disposed of or leased on a long term basis only with the authority of the Senior Budget Manager in accordance with the details given below. Any assets lent to another HE institution should be done so under their insurance, noting that any damage must be reimbursed.
- 9.3 Equipment for disposal should, where possible and where the grant funder permits, be first offered to other Departments. Where this is not possible it should be sold at fair market value.
- 9.4 Surplus furniture should be offered to Campus Services (House Services) who shall be responsible for disposal or re-allocation.
- 9.5 Details of disposals by whatever means should be recorded on the departmental inventory of assets. A certificate confirming that an inventory check has been carried out should be supplied to the Director of Finance each August.
- 9.6 Surplus computers should be offered to the Information Services department. On disposal of computers staff should ensure that all confidential data has been erased from the hard disk.
- 9.7 Persons selling or donating items have a duty of care. Prior to making a sale of any electrical and/or mechanical equipment the University Health Safety & Environment Office must be consulted. The piece of equipment may need to be checked before sale or donation to third parties and provided with either a certificate that it is safe to use OR a note describing what safety flaws it has and what will be required to bring it up to current standards.
- 9.8 In the same way that the fixed asset register is updated when an item is purchased, it also needs to be updated when an item is disposed of. Disposal includes where an item is sold, transferred out of the University, part exchanged or scrapped. If the asset was originally worth £10,000 in value, a Fixed Asset Disposal form needs to be completed and returned to the Finance Department <http://www.aber.ac.uk/en/finance-office/information-for-staff/forms/>
- 9.9 Alternatively, if the asset is to be disposed of as waste then an appropriate assessment must be made of health and safety and environmental risks and regulations (such as WEEE and Directive Waste Duty of Care) need to be followed. Contact the Health, Safety and Environment Office for further information.
- 9.10 Motor Vehicle disposals should be notified to the Finance Department so that the vehicle can be removed from the insurance schedule, please follow the DVLA guidelines on http://www.direct.gov.uk/en/Motoring/BuyingAndSellingAVehicle/RegisteringAVehicle/DG_4022311

Section 10: Gifts & Hospitality Policy

10.1 Introduction

- 10.1.1 This policy sets out the University's expectations of its staff and members of Council and other committees on the giving and receiving of gifts and hospitality. The policy should be read in conjunction with the Guidelines to the Bribery Act 2010 which can be found on the [Ministry of Justice website, and AU's Anti-Bribery Policy](#). In principle, university staff members and officers are not allowed to accept any hospitality.
- 10.1.2 Staff should be aware that this is an area where perception is almost always more important than fact. The acceptance of gifts and excessive hospitality can cause damage to the University's reputation and may lead to prosecution under the Bribery Act 2010. This policy seeks to protect staff from the suspicion of dishonesty as well as from the perception that their decision-making may have been influenced as a result of the acceptance or provision of gifts or hospitality. By doing so, the policy aims to ensure staff are free from any conflict of interest.

10.2 Definitions

- 10.2.1 Gifts are items or services given or received to an individual for which no payment has been made in return or where the item or service has been accepted or provided at a level clearly below an appropriate market value.
- 10.2.2 Hospitality can be defined as any food, drink, accommodation or entertainment which has been provided either without charge or at a heavily discounted rate.

10.3 Principles

- 10.3.1 No staff or members of the University Council or committees must accept, solicit or offer any personal benefit as an inducement or reward for taking specific action or for showing favour or disfavour to any other person. This includes the acceptance or solicitation of benefits on behalf of other related parties, such as partners, spouses, other family members or colleagues.
- 10.3.2 Before accepting small unsolicited gifts or other benefits, staff should determine that acceptance:
- does not place them in a position where their integrity or professionalism may be called into question.
 - bears no direct or perceptible indirect link to any formal procurement process for goods or services
 - does not create a specific or general obligation which the member of staff or the University is required to fulfil.
 - does not constitute an actual or perceived inducement in respect of a decision that the University must take.
- 10.3.3 These principles notwithstanding, the University accepts that there may be circumstances where the unsolicited acceptance of gifts or hospitality will be appropriate, or indeed where declining such gifts or hospitality may cause offence that is detrimental to the University's interests.
- 10.3.4 The University expects its staff and also the members of the University Council to exercise the utmost care when being offered gifts and hospitality when on University business. In particular, care should be taken when being offered a gift or hospitality from a person who, or organization which, has or hopes to have a contract with the University. Additionally, staff should take special care when being offered gifts or hospitality from a person who, or an organization which, might be perceived to be seeking to gain academic advantage or influence. This will include, but is not limited to, such circumstances as acceptance onto a programme of study, assessing a student's work, or the interpretation or provision of favourable research results.
- 10.3.5 If, having previously accepted a gift a member of staff finds him or herself in a position where a decision might be construed as having been influenced by the acceptance of that gift the resulting conflict of interest must be declared to the Director of Finance as soon as possible.

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- 10.3.6 The guiding principle is that the gift should be proportionate and appropriate to the circumstances in which it is offered or received. Staff should at all times avoid the risk of accepting or providing gifts which might be perceived as immoderate, excessive or extravagant, whether by members of the University or the public.

10.4 Guidance

General

- 10.4.1 Before accepting unsolicited gifts or other benefits and irrespective of the guidance given below, staff have a personal responsibility to consider in every case whether acceptance might put them in breach of the principles outlined above. Where this is, or may be perceived to be the case, staff should politely decline.

Receiving Gifts

- 10.4.2 Staff may accept gifts of low intrinsic value (generally taken to be below £30), such as tokens of gratitude; promotional and corporate gifts bearing the institutional or organisational logo or name of the giver; or books (including e-books) from publishers to academic staff where the books are relevant to the academic and/or professional interests of the staff concerned.
- 10.4.3 Gifts of greater than low intrinsic value should on the whole be declined or returned. All such gifts, whether declined or accepted, must be reported to the Senior Budget Manager and be entered into a Register of Gifts & Hospitality (see below). Senior Budget Managers must report such gifts to the Director of Finance.
- 10.4.4 Advice on whether a gift of greater than low intrinsic value can be accepted should be sought in the first instance from the relevant Senior Budget Manager who should refer the matter to their Accountable Budget Manager if they consider it appropriate to do so.
- 10.4.5 Gifts of greater than low intrinsic value that are nevertheless accepted should normally be regarded as the property of the University and used or retained accordingly.
- 10.4.6 Gifts of money (or monetary instruments) to staff should never be accepted regardless of amount. Gifts of money to the University should be received only if they are clearly charitable donations, co-ordinated through the Director of Development and Alumni Relations. (See Gifts Policy at Appendix A)
- 10.4.7 Staff are wholly responsible for any tax implications that may be associated with the receipt of personal gifts or other benefits, including any responsibility for reporting them to HMRC.

10.5 Providing Gifts or Hospitality

- 10.5.1 Business gifts, including hospitality, may on occasion be provided by the University. This would normally be acceptable in circumstances where external or international visits take place and gifts are exchanged as a means of cementing goodwill, or as tokens of gratitude.
- 10.5.2 In this regard, gifts should normally be of a type and value which fall within the guidance set out above for the acceptance of gifts, and especially in accordance with the description given at paragraph 10.4.2.
- 10.5.3 Hospitality provided to external visitors should likewise fall within the description set out above for the receipt of hospitality.
- 10.5.4 Where gifts or hospitality are offered that fall outside the definitions and scope of the above principles and guidance, these must be entered into a Register of Gifts.
- 10.5.5 University funds shall not normally be used to purchase gifts or provide benefits in kind to members and former members of staff. In exceptional circumstances, such as retirement after long service, Senior Budget Managers

Financial Procedures

may authorise appropriate levels of expenditure if previously agreed with the Director of Finance.

- 10.5.6 Goods, services, vouchers, payments, etc. received from suppliers or agents (other than goods officially ordered) shall be declared to Senior Budget Manager who will maintain records. This rule is waived in respect of small items, such as diaries, provided that they have a value not exceeding £30.
- 10.5.7 The Director of Finance shall maintain a register of notified hospitality and shall require each Head of Department to keep such a register and provide an annual return to the Director of Finance.
- 10.5.8 Staff are reminded of the need to be mindful of the provisions of the Bribery Act and to take account of the University's policies and procedures relating to this.

10.6 Register of Gifts

- 10.6.1 In the interests of transparency, Senior Budget Managers, Pro Vice Chancellors and the Vice Chancellor must ensure that local Registers of Gifts are kept within their areas of responsibility.
- 10.6.2 Each Register should record the following:
- Description and Nature of gift;
 - Whether the gift was received or provided by a member of the University;
 - Value or estimated value;
 - Name of individual/company providing the gift;
 - Whether the gift was accepted or declined;
 - Date of receipt;
 - Name of individual/company who received the gift, and if a University employee, whether personally or on behalf of the University;
 - The circumstances within which the gift was offered.
- 10.6.3 In the case of members of the University Council, gifts should be recorded by the Clerk to the Council in the Register held by the Vice-Chancellor's Office
- 10.6.4 Each local register shall be reported annually, or on request, to the Director of Finance for onward reporting to the University Audit and Risk Committee, as appropriate.
- 10.6.5 Failure to declare gifts or failure to include them on a timely basis on the Register of Gifts & Hospitality may constitute misconduct, particularly where acceptance or provision of such gifts calls into question the integrity of the individual receiving or offering such gifts or where as a result the University is brought into disrepute.

Recipient/ Provider	Who to report to
Staff within Departments	Senior Budget Managers
Senior Budget Managers	Line-Manager or Director of Finance
Institute Directors, Heads of Departments & Pro Vice Chancellors	Director of Finance
Independent members of Council	Clerk to the Council
Vice Chancellor	Chair of Council

ABERYSTWYTH UNIVERSITY

REGISTER OF GIFTS & HOSPITALITY

Name of Employee (recipient)	Job title and Department	Description of Gift/ Hospitality received / offered (including date)	Name of External Organisation that made the offer	Circumstances under which offer was made	Estimated Value	Accepted / Declined	Date of Notification	Approved by and date (where appropriate)

Form for Receipt of Offers of Gifts or Hospitality

All Offers (whether accepted or refused) of Gifts or Hospitality	
Name of Employee (Recipient)	
Job Title and Department	
Description of Gift/ Hospitality Offered (including Date Received/ Date Offered)	

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Name and Address of the External Organisation that has made the Offer	
Relationship to the Company and circumstances under which Offer was made	
Estimated Value	
Accepted/ Declined	
Reason for Acceptance/ Decline	
Employees Signature	
Date of Notification	
Acceptance of Offers of Non Trivial Gifts or Hospitality	
HOD or R&S Comments	
HOD or R&S Signature confirming receipt of Gift/ Hospitality in accordance with Policy	

11 EXECUTION OF DOCUMENTS ON BEHALF OF ABERYSTWYTH UNIVERSITY

All documents to be executed as deeds shall be affixed with the University's Common Seal in line with the procedures outlined at Ordinance 16 ("The Council: Custody and Use of the Common Seal").

Such documents shall include agreements relating to property purchase, sale, lease, and rental transactions; warranties; consortium and framework access agreements; legally-binding Memoranda of Agreement; and Power of Attorney.

Individuals are encouraged to seek advice from the University Secretary, as Clerk to the Council, where they are uncertain whether or not a document should be executed as a deed.

Any documents which do not need to be executed as deeds may be signed on behalf of Aberystwyth University by the appropriate individual, as outlined in Appendix B of the Financial Regulations – Secondary Delegations.

Development and Alumni Relations Office

GIFT POLICY

Appendix A

Preamble

The purpose of this policy is to define the criteria under which philanthropic gifts to the University are solicited, accepted, stewarded and recognised. The policy will need to be strictly adhered to by both the Development & Alumni Relations Office (DARO) and the Finance Department; gifts which fall outside of these criteria should be referred to the Vice-Chancellor.

It is not the purpose of this policy document to reiterate standard compliance procedures of the Finance Department as required by accounting legislation, the various charities acts or the relevant SORPs. This is taken as read. Similarly, it is accepted that DARO possesses a highly flexible relational database which will record and track all donations to the highest expected standards, including the recording of amounts, dates, method of donating, fund to which the gift should be put, method of solicitation, to which campaign the donor responded etc. It is presumed that the University's auditors will make any necessary recommendations in this regard.

It is of crucial importance to the University and donors that the policy applies to all gifts. This is to ensure that:

- The University is protected from potential damage if a gift is accepted from a person, company or institution which may not be "fit and proper" in the eyes of society;
- The University is protected from reputational damage, commercial loss and/or civil/criminal damages as a result of accepting gifts which have a detrimental impact upon its image, finances or legal liability;
- Donors are properly thanked, acknowledged and reported upon – this being, quite apart from a moral imperative, the primary method of beginning the solicitation process for further gifts;
- Donations are correctly apportioned according to the wishes of the Donor, as required by both best practice and the provisions of the Charities' Act;
- The University is perceived as open, active and honest in its dealings with its donors, that it believes in transparency and welcomes the concept of active partnership with its supporters and that, as a result, it maximises the potential income stream available from these supporters.

A clear policy also minimises the time required to debate individual gifts, refer potentially risky donations and generally delay the prompt and proper acknowledgement of valid support.

Finally, a clear gift policy attached to a specific project allows anyone negotiating with a potential supporter to be entirely confident that whatever possible donor-recognition vehicles (such as naming opportunities) are being offered is acceptable to the University and will be honoured by it.

This policy is divided into four sections: Solicitation of Gifts; Acceptability of Gifts; Recognition Vehicles; and, Gift Stewardship. Reference to tracking gifts made to departments and individuals other than DARO is also covered.

Appendix A

Solicitation of Gifts

It is a general principle of the University that all philanthropic gifts must be solicited in accordance with the highest ethical standards. Honesty and truthfulness must be maintained at all times and in all dealings with potential and existing supporters.

Notwithstanding the general principle, which will take preference over any specific action or activity, the following are specifically **prohibited** by any and all persons working or volunteering on behalf of the University, whether paid or unpaid:

- Any payment or consideration which relates the level of that consideration to the amount of money raised by a fundraiser (commission payments);
- Any suggestion or promise to a prospective donor of financial, academic, honorary degree or other personal reward not specifically sanctioned by the University in return for a donation;
- Any suggestion or promise to a prospective donor of commercial contracts or other business advantages not specifically sanctioned by the University being given as a result of a donation;
- Any form of undue pressure placed upon a prospective donor to make a donation;
- Any misrepresentation of the needs of the University, the destination and expenditure of any gift, the level of acknowledgement and/or the timescale within which the gift is expected to be utilised;
- Any breach of confidentiality or requested anonymity in regard to either a prospective donor or of an existing donor;
- Any personal solicitation of a prospective donor who, by reason of age, physical or mental infirmity, emotional stress or any other reason, could be reasonably regarded as not at the time of the solicitation being capable of making an informed decision.

The University further affirms that the following Donors' Charter has been adopted as policy and will be published on the Development & Alumni Relations Office website and communicated to all current and potential donors:

Supporters of Aberystwyth University have the right:

1. To be informed of the University's mission, of its capacity to use donations effectively for their intended purposes, and of the way the University is using such donations;
2. To have access to the University's most recent published accounts;
3. To be assured that gifts will be used for the purposes for which they were given;
4. To receive, with consent, appropriate and proportionate acknowledgement and recognition;
5. To be assured that information about donations will be handled with respect and confidentiality;
6. To feel able to ask any question when making a donation and to receive a truthful and forthright answer.

Appendix A

Gift solicitations may be made via any communications vehicle (such as standard mail, email, telephone, or social networking site), or they may be in person. Solicitations made on a person to person basis (such as face-to-face or by telephone) will only be undertaken by DARO staff, volunteers trained by DARO, or staff specifically hired for the purpose and supervised by DARO and/or its accredited agents (such as the use of current students for telephone campaigns).

The University undertakes to ensure as few misunderstandings as possible in regard to donations and the intentions of donors when making such gifts. To that end, it will be the practice of DARO to confirm in writing as soon as practicable any agreement or undertaking made by prospective donors for the benefit of the University. This confirmation will set out clearly what the University understands the donors' wishes to be, the amount, timing and purpose of the donation. It will be the University's practice to allow any prospective donor to cancel a proposed donation if the confirmation does not meet with his/her understanding of what agreement had been reached.

Appendix A

Acceptability of Gifts

It is an inevitable fact of life that there may be sources of philanthropic funding for the University, whether from individuals, companies or other organisations, of which the provenance of any particular donation is open to question, or where the business or personal activities of the donor are ethically, morally or legally questionable.

Equally, as a charitable institution, those charged with the governance of the University have an obligation to maximise income, and the return on any investments, for the benefit of the institution.

It also clear that the level of “due diligence” attached to any vetting of donations and donors must be proportionate to the size of the gift.

In the light of this, the University has adopted a gift-acceptance procedure which aims to create an environment within which the risk of embarrassment is minimised whilst allowing the fundraising function to operate smoothly. To wit:

Donations of £1,000 or less will be accepted with a minimum of vetting;

Donations of between £1,001 and £10,000 will be accepted following a review by the Director of Development and Alumni Relations, except that

Donations over £10,000 (or £5,000 if in cash) will be referred to the Vice Chancellor with a recommendation from the Director of Development & Alumni Relations. The Vice Chancellor may consult as appropriate.

Donations of any value in the form of real estate or gifts in kind upon which conditions are imposed (such as an obligation not to realise their value) or which may expose the University to potential expenditure (such as property with existing restrictive covenants or liabilities) will be referred to the Vice Chancellor with a recommendation from the Director of Development & Alumni Relations. The Vice Chancellor may consult as appropriate. In all other situations, gifts of real estate and other realisable assets will follow the general rules set out above.

It is the University’s general policy to realise non-cash donations at the earliest practicable opportunity unless, by so doing, a genuine and quantifiable gain would be forfeited. It is not, and will not, be the University’s policy to speculate in the market or in any other way to risk the value of the gift at the time of donation other than that recommended by the University’s professional investment advisers.

Appendix A

Recognition Vehicles

Recognition for support given to the University is a vital element of both the solicitation process and the thanking process. During a solicitation, it is vital that the person asking for the gift is in a position to make a firm offer of suitable recognition in the sure knowledge that such an offer will be honoured by the University. The thanking of a donor for a gift must be proportionate to the size of the donation and in line with other public acknowledgements.

The fundraising process, outside of periods when one is in “Campaign Mode”, can be divided into three areas: annual fund, legacy campaign and major gifts. Recognition vehicles are required for all three areas.

Annual Funds

Upon the completion of the first year’s Annual Fund, an assessment will be made of the results in terms of the average annual gifts that have been made. This statistical information will then form the basis of an initial three-level recognition vehicle (for ease of explanation they will be called in this document Bronze, Silver and Gold but labels with a more local flavour will be agreed in due course).

Donors will be informed that they have been enrolled in the relevant “society” based upon their giving level and rights and privileges will be attached to these levels commensurate with their generosity. Future Annual Fund Reports will list donors according to their society. The Gold grouping will be invited to a celebratory reception at the end of each Annual Fund campaign.

It is the nature of the growth of annual funds that the top grouping can become too large to manage as the average gift amounts increase year on year. Provision will therefore be made to add an additional “Platinum” level in due course which will have still more exclusive privileges.

In this way, generosity can be recognised in proportion to the size of gift and donors will be encouraged to raise their sights by lifting their donation to the next level.

The Legacy Campaign

The active solicitation of legacies carries with it one obvious problem in terms of thanking these most vital of donors: namely, that they will not be present to be thanked when their gift is received.

It is therefore crucial to create a vehicle within which the University can celebrate the generosity of these “ultimate” donors during their lifetime through the creation of what is often known as a “legacy club”. This grouping (working title “The 1872 Society”), will award membership to anyone who signifies that they intend to make provision for the University in their Will. Members will receive a suitable plaque or certificate of their membership and will be invited to an annual lunch at the University where they can be thanked in person and brought up to speed with developments at Aberystwyth.

Such a recognition vehicle has two additional benefits. Experience has shown that legacy donors are far less likely to have a subsequent change of mind if they are thanked properly and regularly for their intended support, and also legacy club members tend to increase their lifetime giving and, indeed, have often been seen to band together to fund particular projects.

Major Gifts

Major gifts by their very nature tend to be related to major projects, whether they are capital, or endowment-based. It is very rare for large sums of money to be donated for “general purposes” or for operating costs. If, therefore, donors are enthused by particular projects or areas of operation within the University, the likelihood of having their name (or that of someone they admire) attached to the item, service or position can

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be a major factor when deciding to make a gift and at what level.

It is crucial that the person soliciting the gift has a clear and unambiguous recognition policy for every potential project that may be placed before a donor, and such a policy must be in place before any such solicitation begins. It is therefore a responsibility of the University to ensure that any project deemed worthy of fundraising has such a policy attached to it.

When undertaking capital fundraising projects, successful outcomes are almost always dependent upon achieving the so-called “lead gift” first. Thus it is also crucial that the level of gift, as a proportion of the total to be raised, that will qualify for “lead gift” status is defined at the outset so that the top recognition vehicle can be applied to it. For example, if a new building is to cost £2m, the University must agree at the outset what size of donation would be required as a lead gift and offer the naming of the building (or other substantial recognition benefits) in return for a gift at least at this level. As a general rule of thumb, such a gift would need to be at least 25% of the total to be raised.

Once the highest level of recognition has been agreed, a similar process will be undertaken to “price” other elements of the project (naming of particular rooms, areas, equipment etc.) until every relevant item has been identified and “priced”. In this way, the University will be able to apply a consistent and identifiable policy of major donor recognition which will ensure that no donor feels unappreciated based upon his/her recognition rewards as against the level of donation for any project.

In addition to the immediate nature of project-funding, the University accepts and embraces the concept of partnership and participation with its major supporters. Quite apart from any invitation to such supporters to assist in the governance of the institution which may from time to time be deemed advantageous, the University will create two specific bodies to recognise outstanding support.

The first is intended for those willing to act as senior volunteers for the continuing support of the University, helping it to spread its network and to assist in the solicitation of further gifts – this will be known as the Development Board and will be made up solely of those who have made a significant financial contribution. The Board members will meet twice or three times a year, often in London or Cardiff, but will have regular contact with DARO at other times.

The second is a more celebratory and honorary body (working title: The Vice Chancellor’s Council of Benefactors) which will contain not only the members of the Development Board but all those others who have made significant donations to the University but who may be unwilling, or unable, to take a more active role. There should be a very public celebration of the Council, with a formal gowned enrolment process, every year – perhaps as part of a graduation ceremony.

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Gift Stewardship

The University believes that the proper and regular thanking of its supporters for their donations is a fundamental requirement of any development programme. It is often said that saying “thank you” is the first step to securing the next gift. As a result, the following constitutes a minimum requirement for all donations:

A prompt written acknowledgement of any gift, usually within one working day;

An accurate reference within any such acknowledgement, including the amount, the form of the gift, whether or not a tax-effective method has been used, the total benefit to the University using such a method, and any restricted fund/project to which the gift should be applied;

A listing (unless anonymity has been requested) in the University’s Annual Giving Report and within any smaller report relating to the particular project or campaign to which the gift was made;

A regular update to donors to specific projects on the progress being made, both in terms of the running total achieved and the implementation of the project once the total has been reached;

An invitation to any opening ceremony for completed projects to which they have contributed.

In addition, major donors should receive personalised communications from both the Director of Development & Alumni Relations and the Vice Chancellor, opportunities to see at first hand progress (from the planning stage onwards) on the projects to which they are contributing, consultation as to the implementation of the recognition agreed at the time of the donation and access to senior decision makers within the University.

It should be repeated that these are minimum requirements and that further initiatives to acknowledge the support of donors should be utilised at every opportunity.

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Tracking of Gifts not received direct by DARO

University departments, individual researchers and other affiliated groups and individuals will, from time to time, receive donations and, indeed, may solicit them. It is not the role or intention of DARO to stifle or subvert this entrepreneurial activity, as it will often be far more effective for the department or researcher to undertake any solicitation and unsolicited gifts will, in the majority of cases, come about because of a personal affection or respect for the department/individual concerned – and this should not be endangered.

Where a problem arises, however, is in the adequate stewardship and reporting of such gifts. The University needs to know that such gifts have been received in order to maximise tax-effective and matched-giving opportunities, accurately report on philanthropic income for the University as a whole, and to ensure that the donor is being properly and adequately thanked for the gift.

It is the University's policy that DARO should have the ultimate responsibility for ensuring that all gifts are recorded, additional benefits claimed and donors thanked. As a result, it is a requirement of all departments to notify DARO of any donations received, the amount, and the purpose of the gift and the details of the donor. DARO, in its turn, will ensure that no contact is made with the donor concerned without consultation with the recipient department and that a mutually agreed gift stewardship procedure is followed.

Schools, Departments, Centres and Units also have responsibilities associated with the expenditure of gifts. It is the responsibility of authorised budget holders to ensure that the disbursement of donated funds conforms to the restrictions and purposes of the original gift. DARO will issue guidelines in this regard but if these restrictions are not understood DARO should be contacted for advice.

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Conclusion

The above policy is designed to ensure uniformity of approach, probity, accountability and transparency when dealing with donors and their gifts. It should be reviewed and updated on an annual basis, and DARO will be responsible for ensuring that all departments are aware of its contents and resultant procedures. Department Heads are responsible for ensuring that it is adopted within their sphere of influence and Deans and Pro Vice Chancellors are encouraged to promote its close adherence throughout the University.

Julian Smyth

Director, Development & Alumni Relations Office

jls@aber.ac.uk

01970 621884