

Gifts and Hospitality Policy	
Person Responsible:	Business Manager
Date of Policy:	February 2023
Next review date:	February 2026
Rationale	
This policy provides guidance on the acceptance of gifts, hospitality, awards, prizes or any other benefit which might be seen to compromise the personal judgement or integrity of members, trustees, staff and/or any other representative of the trust.	
Aims	
<p>This policy aims to ensure that:</p> <ul style="list-style-type: none"> • The college's trust's funds are used only in accordance with the law, its articles of association, its funding agreement and the latest guidance. • The trust and those associated with it operate in a way that commands broad public support. • The trust has due regard to propriety and regularity, and ensures value for money, in the use of public funds. • Trustees fulfil their fiduciary duties and wider responsibilities as charitable trustees and company directors. • Members, trustees and staff are aware of what constitutes acceptable gifts and hospitality, and the process that must be followed if they are presented with any of the same. 	
Objectives	
<p>1. Definitions</p> <p>Gifts are any items, cash, awards, prizes, goods or services, offered without expectation of payment or benefit. Gifts also include goods or services offered at a discounted rate, or on terms not available to the general public.</p> <p>Hospitality is defined as food, drink, accommodation or entertainment (such as cultural or sporting events) provided free of charge, heavily discounted or on terms not generally available to the general public.</p> <p>2. Roles and responsibilities</p> <p>Members, trustees and staff</p> <p>Must not give or accept gifts or hospitality to or from a third party where it might be perceived that their personal integrity has the potential to be compromised, or that the college might be placed under any obligation as a result of acceptance.</p> <p>Must not use their official position to further their private interests or the interests of others.</p>	

Must not solicit gifts or hospitality.

Must notify the Business Manager of any gifts or hospitality offered to them or the college with a value of over £50 within 7 working days, even if declined. This will then be registered on the gifts and hospitality register (see appendix 1).

Must consult the Principal before accepting or offering any gifts or hospitality with a value of £50.

Principal

The Principal is responsible for ensuring that staff are aware of and understand this policy, and that it is being implemented consistently.

The Principal will act with the utmost integrity on all matters relating to gifts and hospitality, ensuring that they set a good example to the rest of the college and to those outside the organisation.

They will also ensure, alongside the Business Manager that decisions on whether individuals or the college can accept or offer gifts or hospitality with a value of over £50 are in line with this policy.

Business Manager

The Business Manager will ensure that:

The college maintains a gifts and hospitality register.

Figures for transactions relating to gifts made by the college are disclosed in the college's audited accounts.

The trustees and Principal are provided with information on gifts and hospitality received and given, as appropriate.

They will also ensure, alongside the Principal, that decisions on whether individuals or the college can accept or offer gifts or hospitality with a value of over £50 are in line with this policy.

3. Acceptable gifts and hospitality

Offer of gifts and hospitality received

Members, trustees and staff can accept gifts and hospitality that have a value of up to £50. These do not have to be pre-approved or recorded on the gifts and hospitality register.

Generally, gifts of nominal value, such as small tokens of appreciation, may be accepted. If in any doubt, members, trustees and staff must consult the Business Manager or Principal.

Similarly, hospitality such as working lunches may be accepted in order to maintain good relationships with key contacts, provided the hospitality is reasonable in the circumstances. If in doubt, guidance must be sought from the Business Manager or Principal.

Any gifts or hospitality offered with a value of over £50 must be recorded on the gifts and hospitality register within 7 working days, even if declined. Any member, trustee or member of staff who is offered such gifts or hospitality must consult the Business Manager or Principal before accepting.

If the Principal is the recipient, or intended recipient, of an offer of gifts or hospitality over £50, they must inform the chair of the board of trustees and record the offer on the gifts and hospitality register.

Failure to declare any offer of gifts or hospitality on the register in line with this policy will be treated as a staff disciplinary matter.

Offer of gifts and hospitality given

Any gifts or hospitality provided by the college must not be extravagant. A maximum value of £50 should be used as a guideline.

Expense claims should be made to the Business Manager and receipts must always be enclosed.

The Business Manager or Principal must be consulted about any proposal to provide gifts or hospitality with a value of over £50.

4. Unacceptable gifts and hospitality

The following must never be offered or accepted:

- Monetary gifts
- Gifts or hospitality offered to family members, partners or close friends of members, trustees or staff
- Gifts or hospitality from a potential supplier or tenderer in the immediate period before tenders are invited or during the tendering process
- Lavish or extravagant gifts or hospitality, even if they relate to activities the recipient undertakes in their own time.

This list is not intended to be exhaustive.

5. Declining gifts and hospitality

Any members, trustee or staff member who is offered any of the unacceptable gifts or hospitality outlined in section 4 above should politely decline the offer.

If they feel it would not be appropriate for them to decline, they should refer the matter to the Principal. The Principal may decline the offer, or donate the gift or hospitality to a worthy cause, and must also record the offer on the gifts and hospitality register.

Disciplinary action will be taken against anyone who fails to decline gifts or hospitality the college has deemed unacceptable.

6. Monitoring arrangements

The gifts and hospitality register is monitored regularly by the Business Manager.

This policy will be reviewed every 3 years by the Business Manager and approved by the Finance, Audit and Resources Committee.

7. Links with other policies

This gifts and hospitality policy is linked to the:

- Staff code of conduct
- Staff disciplinary procedures
- Finance policy

Appendix 1: gifts and hospitality register

DATE	NAME	DESCRIPTION OF GIFT/HOSPITALITY AND APPROXIMATE VALUE	PARTY OFFERING GIFT/HOSPITALITY	ACCEPTED/ REJECTED	APPROVED BY

Policy approved: Tuesday 28th February 2023

Chair of Finance, Audit and Resources Committee: Tim Brennan