



Gift & Hospitality Policy

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UCC Governor Approval Committee	22 nd November 2017
UCC Staff Role Responsible	School Business Director

INTRODUCTION

For the purposes of this policy, gifts and hospitality include anything provided without charge to anyone involved with the College and anything provided without charge to anyone outside the College.

The College aims to be an honest and ethical institution. Acceptance of gifts and hospitality by Governors and staff can be called into question and the giving of gifts by the College can be classed as misappropriation of funds.

1. Business Gifts and Hospitality

As a general guideline, business, business gift and hospitality should not be accepted or given by any member of staff/Governor of the College, except as provided for below.

The reason for this is to ensure that the College can demonstrate that no undue influence has been applied or could be said to have been applied by any supplier or anyone else dealing with the College. The College should be able to show that all decisions are reached on the basis of best value and no other reason. Any consideration of whether or not the principles of this Policy have been breached will be determined by reference to this provision.

Any breach of this Policy could lead to disciplinary action and may constitute gross misconduct.

Employees shall not use their authority or office for personal gain as noted in the Fraud Policy and shall seek to uphold and enhance the standing of the College by:

- Maintaining an unimpeachable standard of honesty and integrity in all their business relationships.
- Complying with the letter and spirit of the law, and contractual obligations, rejecting any business practice that might be deemed improper.
- Acting to maintain the interests and good reputation of the College at all times in their business relationships.

Any employee who becomes aware of a breach of policy must report this immediately to his or her Manager who will instigate investigations as necessary. For reporting beyond this, please refer to the Fraud and Whistleblowing Policies.

Any personal interest that may impinge or might reasonably be deemed by others to impinge on an employee's impartiality or conflict with the duty owed to the College in any matter relevant to an employee's duties (such as conflicting business interests), should be

declared in writing. Any member of staff who is aware of any business dealings conferring personal gain, or involving relatives or associates of members of staff must supply details of such transactions for entry into the Register of Business Interests.

Employees are permitted to accept gifts, rewards or benefits from members of the public or organisations the College has official contacts with, **ONLY** where they are isolated gifts of a trivial promotional nature, particularly those that can be used in the office (such as diaries or calendars). Gifts should not, therefore, be accepted if they appear disproportionately generous or could be construed as an inducement to effect a business decision. For each gift received, a Declaration of Gift & Hospitality Form should be completed (Appendix A)

Where purchased items include a 'free gift', such gifts should be either used for College business or used at charity raffles, etc. Again, a declaration should be made (Appendix A).

Should it be felt that refusing a gift would cause embarrassment/offence to the giver and it is of a substantial nature, then the gift must be passed directly to the Principal who will decide whether it can be kept by the College or whether it should be donated to a charity of the College's choosing.

In relation to conventional hospitality, (lunches, outings, tickets for events, etc) provided that it is normal and reasonable in the process of the business transaction, then they may be accepted. Such invitations should not be accepted where there is no reasonable business justification for doing so, where an invitation is disproportionately generous, or where the invitation could be seen as an inducement to affect a business decision. Where the invitation is to attend a charity or fund raising event as a guest, it can be accepted if considered to be for a good cause and of reciprocal benefit to the College.

Any hospitality other than of a nominal value (up to £15) or facilities provided during the normal course of business should be reported for an entry in the Gifts and Hospitality Register (Appendix A).

Any gift which is refused should also be entered into the Gifts and Hospitality Register (Appendix A).

Gifts which can be given to staff/Governors by the Academy include:

1. Flowers on birth of baby or following hospital stay
2. Long service award up to a value of £200 for 25 years' service - £240 if subject to a VAT receipt which can be paid through College accounts (as noted in Finance Regulations). Please note that inappropriate gifts would be classed as alcohol or tobacco and only this particular award can be given as cash.
3. Vouchers can be given as leaving gifts - these are usually subject to a staff collection which removes any cost to the College.

The College will not provide gifts to other individuals or businesses except for promotional items such as pens, diaries and calendars should these be part of its marketing provision. Gifts for visiting schools, e.g. Modern Foreign Language Exchange Partner Schools can be provided as they will represent cultural aspects of the local area or be of use in the Partner School.

The only hospitality which will be provided to both staff and other businesses/individuals will be that provided in the normal course of business such as working lunches and refreshments or any subsistence costs agreed in the course of training for any member of staff. The exception to this rule will be hospitality given at Presentation Evenings to local dignitaries where wine will be provided as required.

Appendix A: Declaration of Gifts and Hospitality Form

Receiving benefits, gifts, rewards or hospitality in return for providing services (even if these services are part of a usual role) can be perceived as an inducement to show favour to a person or organisation in his or her official capacity. Staff are advised to decline such offers, but it is acknowledged that there may be occasions when this is not feasible. All staff should conduct themselves with integrity, impartiality and honesty at all times and should maintain high standards of propriety and professionalism.

If you have received or wish to declare a gift or hospitality please complete the form and return to the School Business Director

Details of employee receiving gift or hospitality

Name	
Job Title	
Department	
Date of Declaration	

Description of gift or hospitality

Description	
Value / estimated value	
Purpose of the offer	
Person / organisation providing the gift or hospitality	
Relationship to the person / organisation offering the gift or hospitality	
Acceptance of gift / hospitality	Yes / No

Gift / hospitality already accepted by employee

Explanation why prior approval not sought	
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Approved by

Signature	
Date	
Name	
Job Title	

