



POLICY IN RESPECT OF THE RECEIPT OR OFFER OF HOSPITALITY AND GIFTS

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For Governors and Members of Staff

1. INTRODUCTION

Governors and members of staff¹ should not accept or offer corruptly any gift or consideration (or have them given to members of their families) as an inducement or reward for doing, or refraining from doing, anything in an official capacity or showing favour or disfavour to any person in an official capacity. The test to be applied is whether in all the circumstances the gift or hospitality is reasonable and justifiable. Gifts and hospitality should only be accepted when the individual is certain that in so accepting, he/she does not place the College in a position where its reputation for scrupulous behaviour could in any way be jeopardised.

2. RECEIPT OF GIFTS

The receipt of casual gifts by contractors, suppliers, parents and students should be declined; the only exception being modest personal gifts at Christmas/special occasions or gifts of a promotional nature given to a wide range of people. These gifts must not have a value individually in excess of £50. For members of staff gifts over £50, and for governors all gifts, should be recorded (see para 4 below).

Gifts in excess of £50 should generally be returned with a polite refusal. Where refusal of a gift in excess of £50 might give serious offence, it should be reported to the Principal/Finance & Resources Controller to determine whether the circumstances are such that it may be retained and how it should be dealt with. All gifts in excess of £50 are the property of The Henley College. Under no circumstances must a governor or member of staff accept an offer of cash.

Where the individual is uncertain as to the intentions of the donor of the gift or the propriety in accepting the gift, irrespective of the value, advice should similarly be sought from the Principal/Finance & Resources Controller. Examples might be gifts which could be seen as intending to influence the outcome of an exam, admission to the College or the award of business.

NB Not included in the above are items that are given from work colleagues such as leaving, or birthday presents.

3. RECEIPT OF HOSPITALITY

It is not always possible or desirable to reject offers of hospitality, for example, attending a function in an official capacity, or having a working lunch. Hospitality in these circumstances is defined as any seminar, conference, event, lunch/dinner or other form of entertainment provided free of charge by a body external to the college.

Hospitality may be accepted where it is clearly intended to build relationships within either an existing or a proposed working arrangement, and where the hospitality offered would not be considered lavish and provided that the member of staff or the Governor and or External Member concerned informs the Director of Governance and the Finance & Resources Controller, of the hospitality in writing. An e-mail will suffice for this purpose.

¹ Members of staff include an employee, agency contract worker or a self-employed worker engaged by the college

It is acknowledged that staff at senior levels in the organisation, may from time to time be offered hospitality in connection with their responsibilities as Senior Managers in the college. The following rules will apply in determining the acceptability and extent of hospitality:

- Hospitality should be accepted only if directly relevant to the individual's responsibilities.
- Hospitality must not be accepted if this might be seen as compromising the individual's position in connection with contractual commitments or negotiations.
- Hospitality may be accepted if it is considered beneficial to the college (e.g. projection of its role in a positive light or in connection with its role within the Community and with its partner organisations). If in doubt about the propriety of accepting hospitality, governors and members of staff should consult with the Principal/Finance & Resources Controller.
- Hospitality must, if accepted, be reasonable in the light of its extent and nature and must not put in doubt the individual's integrity and impartiality.
- A register of all hospitality and gifts must be maintained by the Finance & Resources Controller and be available for inspection by auditors or the Audit Committee as and when required.
- The acceptance of hospitality/gifts must be in accordance with Financial Regulations.

4. PROCEDURE FOR REGISTERING GIFTS OR HOSPITALITY

Where hospitality/gifts are accepted by a governor or member of staff within these guidelines, these, must be registered as defined in paras 2 and 3 above as soon as possible after receipt. (A copy of the form to be used to register either a gift or the receipt of hospitality is attached.) Acceptance of a gift or hospitality which is outside of these guidelines, and/or failure by a member of staff to notify the Finance & Resources Controller may be dealt with under the disciplinary procedure.

If the Principal/Finance & Resources Controller is in any doubt about the propriety of accepting a gift or offer of hospitality, he/she should consult the Chair of the Governing Body.

5. OFFER OF GIFTS AND HOSPITALITY

Governors and members of staff should follow similar principles to those outlined above when considering the **offer** of a gift or hospitality in connection with the college in ensuring that it is proportionate to the circumstances and could not be seen as in any way undermining the integrity and reputation of the College. Contractors, sub-contractors and agents will be expected to behave in similar terms to staff and governors.

6. BUYING/SELLING OF PERSONAL GOODS

Members of staff must not become involved, in any way, in the buying from or selling of personal goods on behalf of a client/supplier. This can be open to misinterpretation.

7. NOTIFICATION

A copy of these guidelines will be available to staff on the College intranet.

REVIEW CYCLE

Every three years unless there are statutory or other changes which justify a review.

APPENDIX 1

RECEIPT OF GIFTS AND HOSPITALITY FORM

Recipient of Gift/Hospitality	
Gift/Hospitality from:	
Date Gift/Hospitality Received:	
Cost of Gift/Hospitality (or estimation):	
Details of Gift/Hospitality:	
Name:	
Signature:	
Date:	
Authorised by:	
Name:	Position:
Signature:	
Date:	