



# STRANMILLIS UNIVERSITY COLLEGE

A College of Queen's University Belfast

## **GIFTS AND HOSPITALITY POLICY**

## VERSION CONTROL

Version No:	Reason for Update	Date of Update	Updated By
1	To update current arrangements	December 2015	Finance and Corporate Governance
2			
3			
4			
5			
6			
7			
8			

## **Policy on the Acceptance of Gifts and Hospitality**

### **1. Introduction**

Stranmillis University College (The College) is committed to the highest level of corporate governance and ethical standards in relation to the stewardship of the public and private funds for which it is responsible.

This policy provides guidance to staff and to the Governing Body and its Committees on the circumstances in which it is, and when it is not, appropriate to accept gifts and hospitality. It is also designed to provide protection, both for these individuals and for the College, on those occasions when a gift or hospitality has been accepted, by recording these and the reasons for their acceptance, in an accountable, objective and transparent way.

This policy should be read in conjunction with the following College policies and procedures:

- Code of Conduct;
- Financial Regulations;
- Register of Interests Policy;
- Anti-Fraud and Bribery Policy;
- Anti-Money Laundering Policy;
- Procurement Policy and Procedures Manual;
- Grievance and Discipline Procedures;

The Anti-Fraud and Bribery Policy, developed in response to the Bribery Act, enacted on 1 July 2011, is of particular relevance.

### **2. Policy Objectives and Guiding Principles**

This policy is underpinned by the following guiding principles:

- (i) All staff and members of the Governing Body should adhere, at all times, to the Seven Principles of Public Life, set out by the Nolan Committee - these are selflessness; integrity; objectivity; accountability; openness; honesty; and leadership;
- (ii) The conduct of individuals should not create suspicion of any conflict between their professional duty and their private interest;
- (iii) The action of individuals acting in an official capacity should not give the impression (to any member of the public, to any organisation with whom they deal, or to their colleagues) that they have been (or may have been) influenced by a benefit to show favour or disfavour to any person or organisation;
- (iv) The reputation of the College will be at risk if an unethical relationship is fostered with an individual, business or an organisation.

In this respect, it is a disciplinary offence for a member of staff or a member of the Governing Body to accept any benefit as an inducement or reward:

- For taking any action (or specifically not taking action) in his/her official capacity.
- For showing favour (or disfavour) to anyone in his/her official capacity.

### **3. Scope of the Policy**

The policy applies to Governors and all levels of College staff, both full-time and part-time, where an individual/individuals are offered gifts and hospitality in connection with their role with the College.

### **4. Definitions**

The term 'gift' includes any personal, material or financial advantage or reward. It also includes gratuities and discounts.

'Hospitality' includes meals and drinks, invitations to events, accommodation, or travel.

### **5. Considerations**

#### **5.1 General Considerations**

Before a gift or hospitality is accepted, consideration should be given to whether:

- this is likely to help business effectiveness and foster strategic relationships;
- this would create any obligation, or perceived obligation, on the part of the recipient;
- the frequency and scale of hospitality accepted is significantly greater than the College would be likely to provide in return;
- the gift or hospitality could be considered frequent, lavish or prolonged;
- this is connected with any decision affecting the College or the individual or organisation offering it;
- this relates to the acceptance of any gift from a person or organisation which has, or is hoping to have, a contract with the College;
- this provides a benefit to the College which outweighs the risk of possible misinterpretation of the offer of the gift or hospitality.

If on consideration of these factors, acceptance of the gift, gratuity or hospitality seems inappropriate, then the offer should be declined.

If there is doubt as to whether or not to accept a gift, this should be discussed with the Secretary to the Governing Body.

## **5.2 Supplier Conflicts**

If an inappropriate approach is made to any member of staff by an existing or potential supplier, contractor or service provider this should be reported to the Procurement and Contracts Manager who will decide what further action is appropriate. Should such an approach be made to a member of the Governing Body, this should be reported directly to the Principal.

## **6. Gifts – General Guidelines**

### **6.1 Acceptance of Gifts**

'Token' or seasonal gifts with a value of less than £20, may be accepted, without the need to seek approval or the need to record the gift in the College's Register of Gifts and Hospitality. Such gifts might include diaries, pens, calendars, paperweights displaying the company logo, box of chocolates/biscuits, hamper or bottle of wine or spirits etc.

Acceptance of gifts valued in excess of £20, should be considered in line with the approval mechanism detailed in Section 8 below.

### **6.2 Refusal of Gifts**

Gifts valued/judged to be in excess of £20, should not be accepted in the following circumstances:

- (i) As an inducement either for doing something, or not doing something, in an official capacity;
- (ii) If acceptance results solely in personal benefit, i.e. there is no benefit to the College in terms of business effectiveness and fostering of strategic relationships;
- (iii) If there is any possibility of an ulterior or dishonest motive on the part of the donor;
- (iv) Where the gift is in the form that is equivalent to cash such as a gift voucher or a discount card and/or actual cash or cheque.

Gifts offered valued over £20, including those accepted or not accepted, following advice from the Secretary to the Governing Body, will be recorded in the College's Register of Gifts and Hospitality – see section 8 below.

## **7. Hospitality – General Guidelines**

### **7.1 Acceptance of Hospitality**

Hospitality, regardless of the estimated value, should not be accepted where there is no organisational benefit to be derived from acceptance.

Modest hospitality may be accepted in the following circumstances:

- When a member of staff is in the process of building a key strategic relationship with the provider of the hospitality;
- Where a working lunch /dinner of modest standard is offered, in the course of visits or meetings, to enable parties to discuss business relating to the strategic aims of the College;
- If the offer relates to attendance at a social or sporting event where it is considered appropriate for the College to be represented;
- Where participation is undertaken in an official capacity, e.g. attending or speaking at a conference on behalf of the College.

For consistency with the College policy on providing hospitality when hosting guests the following is considered to be modest hospitality:

Lunch – up to £25 per head

Dinner – up to £40 per head

Please note that these limits include gratuities and a modest amount for alcoholic beverages.

Acceptance of hospitality valued in excess of the above limits, should be considered in line with the approval mechanism detailed in Section 8 below.

## **7.2 Refusal of Hospitality**

Hospitality should not be accepted, regardless of estimated value, where there is no organisational benefit to the College including in the following circumstances:

- Offers of free accommodation, meals, holidays, travel, weekend breaks, free invitations to sporting occasions and entertainment, where there is no organisational benefit. Particular care should be taken when an offer is from an organisation or an individual that supplies, or has the potential to supply goods, services or works to the College.
- Inducements which could lead to the creation of a new contractual arrangement or the renewal of an existing contractual arrangement between the College and the supplier, contractor or service provider.
- Invitations involving hospitality from an organisation or individual with which the College has a commercial contract or a potential commercial contract or supplier relationship during tender competition periods.

On occasions, suppliers, contractors and service providers may issue invitations to attend sporting, social and cultural events. Staff and members of the Governing Body are advised that they need to be mindful of the cumulative effect of accepting multiple hospitality invitations from the same supplier over a short timescale.

If there is any doubt about whether or not hospitality should be accepted, advice should be sought from the Secretary to the Governing Body.

Any hospitality offered, with an estimated value in excess of the limits outlined in 7.1 above, whether accepted or not, following advice from the Secretary to the Governing Body will be recorded in the College's Register of Gifts and Hospitality – see section 8 below.

## **8. Gifts and Hospitality Reporting Arrangements**

- (i) Where a gift valued at £20 or over is offered or received, a Gifts Registration Form (Annex A) should be completed immediately and forwarded to the Secretary to the Governing Body, who will advise on whether or not the gift can be accepted. In reaching a decision on whether or not to accept a gift, the Secretary to the Governing Body will take account of the cumulative value of gifts received by an individual, from a given organisation or individual, in any rolling one year period. Consideration will also be given to whether offence may be caused if the gift is refused.
- (ii) Where hospitality, other than modest hospitality, is accepted or refused based on the guidelines in Section 7, this should be reported to the Secretary to the Governing Body using the Hospitality Registration Form at Annex B. An estimate of the cost of the hospitality must be provided. If a member of staff or a member of the Governing Body is unsure whether they should accept hospitality, advice should be sought from the Secretary to the Governing Body on whether or not to accept the invitation using the Hospitality Registration Form at Annex B. Consideration will also be given to whether offence may be caused if the hospitality is refused.
- (iii) The Secretary to the Governing Body will record all decisions to accept or decline a gift or hospitality in the central Gifts and Hospitality Register. Access to the Gifts and Hospitality Register will be made available on request.
- (iv) In exceptional circumstances, where gifts / hospitality have been offered during the course of an institutional visit abroad, this should be reported / approved within 5 working days of the individual's return to the College.

**9. Further Information**

Further information on this policy is available from the Finance Department/Secretary to the Governing Body, on request.

Dr Anne Heaslett

Date: December 2015

Principal

Review Date: December 2018

For distribution to: All Staff

## GIFTS REGISTRATION FORM

This form must be completed immediately after the gift(s) is first offered in relation to all relevant gifts with an estimated valued in excess of £20.

**1. PROPOSED RECIPIENT DETAILS:**

Name \_\_\_\_\_ Job Title \_\_\_\_\_

Department/Governor \_\_\_\_\_

Contact No. \_\_\_\_\_ Email \_\_\_\_\_

**2. INFORMATION ON GIFT(S):**

(To be completed by the Recipient)

Source of Gift(s) and relationship to Recipient

\_\_\_\_\_  
\_\_\_\_\_

Description and estimated value of Gift(s) \_\_\_\_\_

\_\_\_\_\_

Date of Offer \_\_\_\_\_

Reasons to justify accepting Gift if acceptance is intended

\_\_\_\_\_  
\_\_\_\_\_

Details of Gift(s) Offered to Recipient by this source in the past 12 months

\_\_\_\_\_

**3. ADVICE** (To be completed by the Secretary to the Governing Body)

***Please delete as appropriate:***

I advise that the Recipient may accept / may not accept the Gift(s) described above.

Please indicate reason(s) for this advice.

\_\_\_\_\_

Signed \_\_\_\_\_ Date \_\_\_\_\_

*Secretary to the Governing Body*

**HOSPITALITY REGISTRATION FORM**

This form must be completed immediately after the Hospitality is first offered in relation to all relevant hospitality i.e. that is hospitality excess of £25 for lunch and £40 for dinner.

**1. PROPOSED RECIPIENT DETAILS:**

Name \_\_\_\_\_ Job Title \_\_\_\_\_

Department / Governor \_\_\_\_\_

Contact No. \_\_\_\_\_ Email \_\_\_\_\_

**2. INFORMATION ON HOSPITALITY:**

(To be completed by the Recipient)

Source of Hospitality and relationship to Recipient.

\_\_\_\_\_  
\_\_\_\_\_

Description and estimated value of Hospitality \_\_\_\_\_

\_\_\_\_\_

Date of Offer \_\_\_\_\_

Reasons to justify accepting Hospitality if acceptance is intended

\_\_\_\_\_  
\_\_\_\_\_

Details of all Hospitality offered to Recipient by this source in the past 12 months

\_\_\_\_\_

**3. ADVICE):** (To be completed by the Secretary to the Governing Body)

***Please delete as appropriate:***

I advise that the Recipient may accept / may not accept the Hospitality described above.

Please indicate reason(s) for this advice

\_\_\_\_\_

Signed \_\_\_\_\_ Date \_\_\_\_\_

*Secretary to the Governing Body*