

POLICY AND PROCEDURE 13



RECEIPT OF HOSPITALITY AND GIFTS POLICY

Policy Statement

Oaklands College expects that the conduct of staff and corporation members should not create suspicion of any conflict between their official duty and private interest.

Strategy

To achieve this:

- Guidelines setting out what is and is not acceptable in terms of the receipt of gifts and hospitality are included in this policy
- In carrying out their duties, staff and members of the Corporation are not expected to solicit any gift or other consideration as an inducement or reward
- A file is maintained to ensure transparency relating to the acceptance of hospitality and gifts
- Members of staff are responsible for making a return on the standard form, to any member of the Senior Leadership Team, who will then make the entry in the hospitality and gifts register file.

Operational Outcomes

As a result:

- Staff and Corporation members are clear about the guidelines for the receipt and hospitality of gifts
- The Hospitality and Gift file for staff and Corporation members will be available for inspection for the purposes set out above and for inspection by the Finance Director, the internal auditors and the external auditors

Scope & Context

- This policy covers all staff and Corporation members

General Principles & Responsibilities

- Staff and Corporation members are responsible for reporting the receipt of hospitality and gifts to their Line Manager in accordance with the corporate guidance
- The Finance Director will determine whether registration is required

Monitoring, Review & Evaluation

The implementation and effectiveness of this policy will be monitored, reviewed and evaluated through:

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- Reviews by the internal auditors and external auditors

Guidelines on the Receipt of Hospitality and Gifts

1. Introduction

- 1.1 The acceptance of gifts or hospitality, even of a modest nature, can cause suspicion and loss of confidence in the integrity of the individual. In carrying out their duties, staff and members of the Corporation are not expected to solicit any gift or other consideration as an inducement or reward.
- 1.2 The Corporation has adopted a code of conduct that draws attention to the seven Nolan principles of Standards in Public Life. These are:
 - Selflessness
 - Integrity
 - Objectivity
 - Accountability
 - Openness
 - Honesty
 - Leadership
- 1.3 The code would be breached and the good standing of the College jeopardised, if more favourable treatment were given to certain individuals, groups or organisations. It is for that reason that a policy is required and it is appropriate that this policy covers both staff and Corporation members.

2. Gifts

- 2.1 The offer of casual gifts by contractors, suppliers, parents and students should normally be declined; the only exception being small personal gifts at Christmas. Other gifts should be returned with a polite refusal and under no circumstances must an employee accept an offer of cash.
- 2.2 However, where the refusal of a small gift could give serious offence, it should be reported via the Line Manager, via email to the appropriate Senior Management Team member who will determine whether the gift may be retained. For the purposes of this policy, 'small' personal gifts are defined as having a value not exceeding £20.

If the value of the gift exceeds £20 the Senior Management Team member approving the retention of the gift is responsible for making an entry in the Hospitality and Gifts Register

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3. Hospitality

- 3.1 Hospitality, for the purposes of this policy is defined as any seminar, conference, event, lunch/dinner or other form of entertainment provided free of charge external to the college. This will not include attendance at seminars, conferences etc. that are a staff development activity, where attendance has been approved through the completion and authorisation of an SD1 form.
- 3.2 Hospitality for members of staff can arise during normal working hours, for example attending a function in an official capacity, or having a working lunch, as well as during individual's own time. Invitations to corporate sporting events, art exhibitions and other functions such as dinners are generally recognised to be a form of corporate marketing. The organisation providing the invitation is either attempting to cement a relationship with the college or to obtain new work. Some events are purely social whereas others include some element of product/service sales pitch.
- 3.3 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 should only be accepted when it is reasonably incidental and appropriate to the circumstances. It is recognised that staff at Senior Management Team level and above, may, from time to time be offered hospitality in connection with their responsibilities as Senior Managers of the College. The following rules apply in those circumstances in ascertaining whether the level of hospitality is appropriate:
- Hospitality should only be accepted if directly relevant to the Manager's responsibilities
 - Hospitality must not be accepted if this is or maybe seen as compromising or likely to compromise the Manager's impartiality in negotiating new or re-negotiating existing contracts
 - Hospitality may be accepted if it is considered to be beneficial to the College
 - 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
- 3.4 If any doubt exists regarding the appropriateness of accepting hospitality the individual must consult with their Line Manager.
- 3.5 Transparency relating to the acceptance of hospitality is of critical importance and to ensure transparency all such hospitality must be recorded in the Hospitality and Gifts file.

4. Hospitality & Gifts Register for Staff

- 4.1 The Hospitality and Gifts file for staff is held by the Strategic Leadership Group Support Team.
- 4.2 Members of staff are responsible for making a return, on a standard form available on the College's Intranet, to the Strategic Leadership Group Support Team within five working days of the hospitality taking place, who will be responsible for making the entry in the file.
- 4.3 Where a member of staff has been instructed to attend such an event by his/her Line Manager and hospitality is provided, no return is required.
- 4.4 Failure to make the appropriate return will be dealt with under the College's disciplinary procedure.

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- 4.5 The file will be reviewed by the Finance Director annually.
- 4.6 Where a purchase order requires the approval of the Corporation, the file shall be made available to that committee to assist in the decision making process.
- 4.7 The file shall be available for inspection for the purposes sets out above and for inspection by the Finance Director, the internal auditors and the external auditors.

5. Further Advice

- 5.1 If any further advice or clarification is required about this policy it can be obtained from the Finance Director