

## Gifts And Hospitality Policy

<b>Title:</b>	Gifts and Hospitality Policy	
<b>Reviewed/updated by:</b>	Director of Governance (S Francis)	
<b>Version</b>	2	
<b>Review cycle:</b>	Three years	
<b>Document owner:</b>	Director of Governance	
<b>Date of update:</b>	December 2025	
<b>Next due:</b>	December 2028	
<b>Approval Level:</b>	SLT	Y
	Governors	By: Board via Audit
<b>Date Approved:</b>	December 2025	
<b>Publication:</b>	Intranet	Y
	Website	Y

Version	Author	Date	Section	Changes summary
2	S Francis	November 2025	All	General update to make certain areas more explicit following on from Audit Committee feedback 4 November 2025

### 1. Introduction

As required by the [Bribery Act 2010](#), the College expects all staff and governors to behave with integrity, impartiality and honesty and to maintain high standards of propriety and professionalism at all times. College prohibits any form of corruption, bribery or misuse of authority. The College operates a zero-tolerance policy towards malpractice of any kind.

It is important that all staff and Governors are aware that acceptance of offers, gifts and hospitality made by contractors, suppliers, service providers, students and others, might place them in a vulnerable position regarding perceptions of their professional integrity. Even when offered and accepted in innocence, other people may misconstrue the intention behind such gifts.

### 2. Scope

This policy applies to:

- All College staff.
- Students acting on behalf of the College.
- Third parties representing the College.
- Independent governors and co-opted members.

### 3. Purpose

The purpose of this policy is to:

- Protect staff and governors from allegations of impropriety in relation to offers and acceptance of gifts and hospitality.
- Provide guidelines on what is and what is not acceptable in terms of receipt of hospitality, gifts and gratuities. The College's Anti-Bribery Policy sets out the ways in which the College has limited its exposure to the risk associated with bribery.
- Inform staff and governors on what actions to take when gifts are offered to them by students and other external organisations and individuals.
- The regulations regarding the acceptance of hospitality, gifts and gratuities are set out in the College's Financial Regulations. In addition, Governors are required to abide by the provisions within the Code of Conduct in respect of gifts and hospitality offered by third parties.
- Employees and Governors recognise that they should treat with extreme caution any offer or gift, favour or hospitality that is made to them personally, particularly by persons or organisations who provide (or might provide) work, goods or services to the College.

#### 4. Responsibilities

The policy applies to all members of staff and Governors. Responsibilities under the policy are as follows:

<b>All Staff</b>	All staff who receive/are offered gifts or hospitality.
<b>Line Managers/SLT</b>	Managers should ensure that staff are aware of their responsibilities.
<b>Governors and co-opted members</b>	All Governors/co-opted members who receive/ are offered gifts or hospitality
<b>Director of Governance</b>	Ensure a record is kept of all declared gifts and hospitality

#### 5. Acceptable Gifts and Hospitality

##### 5.1 Gifts

- Governors and staff **can** accept gifts or gratuities of insignificant items such as diaries or publicity items of no commercial value such as small gifts (chocolates, handicrafts, single bottle of wine) from students, for example at the end of a term.
- Gifts and hospitality should not be offered or accepted during procurement exercises, student assessments, award submissions, funding bid processes or other decision-making processes.

**If the gift has an estimated value of more than £45 it must be declared.**

- If in any doubt as to the exact value of the hospitality or gift “Greater than £45” should be stated on the declaration.

If not accepting would cause misunderstanding or offence to the prospective donor, individuals should consult the Director of Governance. [sfrancis@craven-college.ac.uk](mailto:sfrancis@craven-college.ac.uk)

##### 5.2 Hospitality

It is acceptable to offer and receive the following hospitality, and there is no need to obtain approval or register it unless it may be perceived as a possible inducement:

- Normal courtesies of meetings, training courses and conferences including tea, coffee, soft drinks, biscuits, modest working lunches (e.g., sandwiches and buffet food) and evening meals at conferences.
- Accommodation and entertainment provided as part of a conference or training course where attendance has been paid for by the College.
- Hospitality may only be accepted where it is secondary to the specific working arrangement. Where hospitality is accepted, it shall be entered in the Gifts and Hospitality Register.
- All acceptances of hospitality must be on the clear understanding that the Employee or Governor is acting in an official capacity and that no member of their immediate family is benefiting.
- Any hospitality of more than an incidental kind, regardless of whether it is accepted or not **must** be recorded in the Register of Gifts and Hospitality, such as tickets to a sporting /corporate/music event.

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

##### 5.3 Declining Hospitality and Gifts

If it is necessary to decline offers of hospitality and gifts, then this should be done politely and discretely. It should then be explained that this is not permitted by College policy.

#### 6. Unacceptable Gifts and Hospitality

- Governors **must not** receive gifts, hospitality or benefits of any kind from a third party which might be in breach of the Bribery Act 2010 or the College’s Anti-Bribery policy. Any offer or receipt of such gifts, hospitality or benefits should immediately be reported to the Director of Governance.
- Lavish or expensive entertainment of any form including offers for travel or accommodation as individuals should be refused and reported to the Director of Governance.

Cumulative or regular offers of hospitality from any individual or organisation shall be refused and reported.

For clarity, the following must **NEVER** be accepted:

- Monetary gifts regardless of the amount.
- Gifts or hospitality offered to family members, partners or close friends of governors, or staff.
- Gifts or hospitality which could be deemed as influential in the award of a contract or business to an external organisation
- The College also has an Anti-Bribery Policy and Anti - Fraud Policy which together with this policy support the College's reputation for ethical behaviour and for financial probity and reliability.
- Acceptance of hospitality, gifts or gratuities which is outside of the College guidelines and/or failure by an employee to notify the Director of Governance may be dealt with under the College's Disciplinary Procedure.
- This also applies to staff in relation to the timing of student gifts. Some staff could be perceived as being able to influence student marks and grades, progression and awards.

## 7. Offering Gifts or Hospitality

Staff and Governors 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, subcontractors and agencies will be expected to behave in the same way.

## 8. Gifts and Hospitality Register

Hospitality, gifts and gratuities that are accepted by an employee or governor as laid down within the Financial Regulations guidelines must be registered by that individual within **20 working** days. It is the personal responsibility of Governors and staff at the College to record any gifts and hospitality received from third parties using the form shown as appendix 1.

Should any employee or Governor be in any doubt about the propriety of accepting a gift or offer of hospitality, they should consult the Director of Governance. If this is not possible at the time, the facts should be reported within 20 working days.

If the Director of Governance is in any doubt about the propriety of accepting hospitality, gifts or gratuities they should consult the appropriate authority.

A Gifts and Hospitality Register will be maintained by the Director of Governance.

## Monitoring and Review

- The policy will be reviewed every three years or subject to legislative, sector changes.
- The value limit shall be reviewed every three years, and changes communicated to staff.
- To ensure maximum awareness, this policy will be signposted to staff at least annually.
- A report will be provided to the Audit Committee annually.
- A register of all hospitality and gifts must be maintained by the Director of Governance and be available for inspection by auditors or the Audit Committee as and when required.

## Appendix 1

### Gifts and Hospitality Form

<b>Name of the Person who is offered the gift/hospitality</b>	
<b>Department and role</b>	
<b>Date of offer of gift/ hospitality</b>	
<b>Person or Organisation offering the Gift/hospitality</b>	

<b>Reason for the gift/hospitality</b>	
<b>Description of the gift/hospitality</b>	
<b>Estimated or Actual Value of gift/hospitality</b>	
<b>Hospitality accepted?</b>	
<b>Gift accepted?</b>	
<b>Gift retained?</b>	
<b>AUTHORISED (as appropriate):</b>	<b>Sign and Date</b>
Director of Governance	
Recorded on Gifts register	

(Office use only)

<b>AUTHORISED (as appropriate):</b>	<b>Sign and Date</b>
<b>Director of Governance</b>	
<b>Recorded on Gifts register</b>	

Completed forms should be returned to the Director of Governance [sfrancis@craven-college.ac.uk](mailto:sfrancis@craven-college.ac.uk)