

Gifts and Hospitality Policy

Author	Clerk & Governance Advisor to the Corporation
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Person Responsible	Clerk
Approval/review body	Corporate Board
Frequency of Review*	Annually

** Policies will be reviewed more frequently if legal changes or good practice require*

Review History:		
Date of review	Reviewed by	Reason for review
March 2013	Clerk	To update and bring into line with the College Financial Regs
February 2016	Clerk	Review
November 2020	Clerk	Review
November 2021	Clerk	Review
November 2022	Clerk	Review
November 2023	Clerk	Annual Review
November 2024	Clerk	Annual Review – no change

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Related policies/documents:

Staff Code of Conduct

Anti Bribery Policy, Fraud Policy, Safeguarding Children & Vulnerable Adults Policy

1. Statement

The acceptance of gifts or hospitality, even of a modest nature, can cause suspicion and loss of confidence in the integrity of the staff member or Governor. It is contrary to the standards of conduct expected from staff members or Governors within the public service to solicit any gift or consideration as an inducement or reward, or, as staff members or Governors of the College, to accept any fee or reward other than salary, unless formally approved. This policy applies to all employees of the College and to Governors.

2. Objectives

To ensure that all staff and Governors remain free from any conflict of interest with respect to their acceptance of gifts and hospitality from parties to which they are associated through business with the College.

3. Definitions

3.1. 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 should only be accepted when it is reasonably incidental and appropriate to the circumstances. 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.

3.2. Gifts

Gifts are items of value other than a cash or monetary payment, for example, book tokens or wine. When gifts are offered to staff in return for their contribution as part of their duties to particular events, such as speaking engagements, they may be accepted provided that the value of the gift does not exceed £50.

The offer of casual gifts, of a value greater than £50, by contractors, suppliers, parents and students should, normally, be declined. These should be registered centrally with the Clerk & Governance Advisor to the Corporation and should be returned with a polite refusal. Under no circumstances must an employee or Governor accept an offer of cash. Where refusal of a small gift might give serious offence it should be reported to the Clerk & Governance Advisor to the Corporation, to determine under what circumstances it might, justifiably, be retained.

4. Responsibilities

It is the personal responsibility of all College staff and Governors to declare any receipt of gifts or hospitality covered under this policy.

Hospitality/gifts that are accepted by an employee/governor within this Policy must be registered by that employee/governor with immediate effect. Should an employee, or a Governor, be in any doubt about the propriety of accepting a gift or offer of hospitality, he/she should consult the Clerk & Governance Advisor to the Corporation. If this is not possible at the time, the facts should be reported immediately afterwards. Acceptance of a gift or hospitality which is outside of these guidelines, and/or failure by an employee to notify the Clerk & Governance Advisor to the Corporation, may be subject to disciplinary proceedings or, in the case of a governor, call into question the eligibility of such member to remain on the Board.

5. Procedures

The following rules will apply in determining the acceptability and extent of hospitality:

- 5.1. Hospitality should be accepted only if directly relevant to the staff member's or Governor's responsibilities.
- 5.2. Hospitality must not be accepted if this is seen as compromising the staff member's or Governor's position in connection with contractual commitments or negotiations arising therefrom.
- 5.3. If in doubt about the propriety of accepting hospitality, the staff member or Governor must consult the Clerk & Governance Advisor to the Corporation.

6. The Gifts and Hospitality Register

The register is located in the Clerk & Governance Advisor to the Corporation's office and available on request.

Anyone wishing to make an entry into the Register should contact the Clerk & Governance Advisor to the Corporation, who will take details of the gift or hospitality given, and record these in the Register.

North Kent College

Register of Gifts and Hospitality

Date	Name	Gift/ Hospitality	Party Offering Gift/ Hospitality	Accepted/ Rejected

This Register is located in the Clerk & Governance to the Corporation's office