



## Gifts and Hospitality Policy

Author	Clerk & Governance Advisor to the Corporation
Date	November 2025
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
20 November 2025	Clerk	Full revision to align with DfE 2025 Governance and Accountability Framework, AoC Code 2024, and updated Conflicts of Interest Policy

### 1. Statement

North Kent College (“the College”) is committed to conducting its business with integrity, impartiality, and transparency.

The acceptance of gifts or hospitality, even of a modest nature, may give rise to a perception of undue influence or conflict of interest.

This policy ensures compliance with the Department for Education (DfE) Governance and Accountability Framework (2025), the AoC Code of Good Governance (2024), and the Bribery Act 2010. It applies to all staff, governors, volunteers, and contractors acting on behalf of the College.

### 2. Objectives

The objectives of this policy are to:

- Safeguard the integrity and reputation of the College by ensuring all dealings are transparent and ethical;
- Prevent conflicts of interest and undue influence in College decision-making;

- Provide clear guidance on the acceptance, refusal, and recording of gifts and hospitality; and
- Ensure compliance with DfE, Charity Commission, and public sector governance standards.

### **3. Definitions**

For the purposes of this policy, gifts and hospitality include any benefit, favour, or item of value offered to a staff member, governor, or person connected to them, arising out of their College role.

#### **3.1 Hospitality**

Hospitality may include meals, refreshments, receptions, tickets to events, conferences, or other entertainment provided free of charge or at reduced cost.

Hospitality should only be accepted where it is directly relevant to College business, proportionate, and would withstand public scrutiny.

Attendance at sector-related events in an official capacity is acceptable when approved in advance by the Chief Executive or Clerk & Governance Advisor to the Corporation.

#### **3.2 Gifts**

A gift is defined as any item or benefit of value, excluding monetary payments. Examples include wine, books, vouchers, flowers, or event tokens.

Gifts up to the value of £50 may be accepted where refusal would cause offence, provided they are declared to the Clerk & Governance Advisor.

Gifts exceeding £50 must normally be declined or referred for approval by the Chief Executive Officer or Clerk. Under no circumstances may cash or cash equivalents be accepted.

### **4. Responsibilities**

All employees, governors, and associated persons have a personal responsibility to:

- Declare any offer or acceptance of a gift or hospitality as soon as possible;
- Seek advice from the Clerk & Governance Advisor if in doubt;
- Ensure that no gift or hospitality is accepted that could be perceived to influence decision-making or contractual obligations.

Failure to declare an offer or acceptance of a gift or hospitality may result in disciplinary action or, for governors, review of eligibility to serve on the Corporation Board.

## **5. Procedures**

The following principles apply when deciding whether to accept hospitality or gifts:

- Acceptance must be in the College's interests and proportionate to the business relationship;
- Hospitality or gifts must never be solicited;
- Offers during tendering or procurement must always be refused;
- Any offer exceeding £50 must be referred to the Clerk & Governance Advisor for approval;
- A written declaration must be submitted for entry in the College Gifts & Hospitality Register.

## **6. Gifts and Hospitality Register**

The Clerk & Governance Advisor will maintain a central Gifts and Hospitality Register.

All declared offers—whether accepted or declined, must be recorded within five working days of the offer.

The Register will be reviewed annually by the Audit Committee as part of the College's internal assurance reporting and will be made available to auditors on request.

Details to be recorded include:

- Date and nature of gift or hospitality;
- Name of person and organisation offering it;
- Estimated value;
- Whether accepted or declined; and
- Authorisation by the Clerk or Chief Executive Officer.

## Appendix A – Gifts and Hospitality Register Template

The Clerk & Governance Advisor maintains the central register of all declared gifts and hospitality. All staff and governors must submit details using the template below within five working days of any offer.

Date	Name	Gift / Hospitality Description	Party Offering Gift / Hospitality	Estimated Value (£)	Accepted / Rejected / Returned

Completed forms should be sent to:  
Clerk & Governance Advisor to the Corporation  
North Kent College  
Email: yolandahughes@northkent.ac.uk

### Related Policies and Documents

- Staff Code of Conduct
- Anti-Bribery, Fraud and Corruption Policy
- Conflicts of Interest and Third-Party Transactions Policy
- Safeguarding Policy & Procedures
- Financial Regulations
- Public Interest Disclosure (Whistleblowing) Policy