Glasgow Kelvin College

Gifts & Hospitality Policy

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The Board of Management (or any person/group with delegated authority from the Board) reserves the right to amend this document at any time should the need arise following consultation with employee representatives. This Policy has been subject to an Equality Impact Assessment, which is published on our website: https://www.glasgowkelvin.ac.uk/equality-diversity/

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1. Purpose

The purpose of this Policy is to set out rules and guidance for all staff (which should be taken for the purposes of this policy to include members of the Board of Management[1]) to ensure that the College can demonstrate that no undue influence has been applied by an individual or external organisation in the decision making processes within the College.

Courtesy gifts and hospitality must not be given or received in return for services provided or to obtain or retain business but shall be handled openly and unconditionally as a gesture of esteem and goodwill only. Gifts and hospitality shall always be of symbolic value, appropriate and proportionate in the circumstances, and consistent with local customs and practices. They shall not be made in cash.

2. Policy

All staff covered by this policy should be aware that this is an area where perception can be more significant than fact. In circumstances where a gift or hospitality is accepted with selfless motives and solely in the interests of the College, if an external observer could put an adverse construction on a gift or hospitality this is what is likely to happen. In accepting any gift or hospitality, therefore, the individual and, if applicable, his or her line manager, must exercise judgement about how acceptance might be perceived, recognising that, what at first sight might appear to be reasonable, may nevertheless become the subject of unreasonable comment or criticism by external parties. The judgement made therefore needs to include an assessment as to whether the benefits gained by the College through the acceptance of a gift of hospitality might be outweighed by adverse third party criticism, even when that criticism is not reasonable.

3. Scope

This policy and the accompanying procedures cover all offers of gifts and hospitality whether declined or accepted and provide guidelines on acceptance and disclosure.

4. Responsibility

The Board of Management is responsible for the maintenance of this policy and related procedures through the Audit and Risk Committee.

5. Guidance and Procedures

It is important that gifts or hospitality whether accepted or declined are duly recorded in accordance with the guidance which accompanies this policy (published separately). A form should be completed and submitted to the Director of Corporate Services. The College is committed to ensuring that there is complete transparency in this area.

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[1] Board of Management members also sign up to the Code of Conduct for the Members of the Board of Management of Glasgow Kelvin College. It should be noted that Board members are also charity trustees and any reference to Board members in College policy documents also refers to that role.

Gifts and Hospitality Policy Guidance

1. **General Rules**

   a) Employees shall not use their authority or office for personal gain and shall seek to uphold and enhance the standing of the College by maintaining an unimpeachable standard of honesty, impartiality and integrity in all their business relationships.

   b) All employees have a personal responsibility to ensure that an audit trail exists for all offers of gifts or hospitality. The notification of an offer of gifts or hospitality in excess of £50 requires a Form for Receipt of Offers of Gifts or Hospitality to be completed and lodged with the Director of Corporate Services.

   c) Staff may choose, in the interests of transparency, to declare any offer of gift or hospitality below £50.

   d) Where there is any doubt as to the value of a gift or hospitality then the offer should be disclosed to the Director of Corporate Services.

   e) The Director of Corporate Services will maintain a Register of Gifts and Hospitality and shall make this available for inspection as required.

   f) Any offer of a bribe or commission made by external organisations, or anyone else dealing with the College, must be reported at once to a member of the Senior Leadership Team (SMT).

      Senior Leadership Team (SMT)
      Derek Smeall, Principal
      Robin Ashton, Vice Principal
      Jeanette Evans, Vice Principal

   g) These guidelines are intended to complement the Code of Conduct for the Members of the Board of Management.

   h) Any employee who becomes aware of a breach of the Gifts and Hospitality Policy must report this immediately to their line manager and a Vice Principal. Any breach may require appropriate action to be taken against a third party and where an offer is accepted, a proven breach of this Policy will lead to disciplinary action in relation to the employee involved and may constitute gross misconduct.

2. **Gifts**

   a) Gifts should not be accepted where they may appear to be disproportionately generous or could reasonably be construed as an inducement to affect a business decision.

b) Any gifts offered (whether accepted or not) which are not of a trivial nature, should be notified to the Director of Corporate Services using the form in Appendix 1. A gift will be considered trivial if by virtue of its nature or branding it has no material commercial value, that is to say, no unrelated third party would reasonably be expected to purchase the item for a sum in excess of £50.

c) Any gifts falling outside the definition of trivial should not be accepted by an individual except where to refuse a gift may cause offence. In these circumstances the gift should be accepted and disclosed. The disclosure should also record the agreed treatment of any gift. These items are not generally of a personal nature and are likely to be displayed within the College.

d) Staff should not normally accept more than two gifts from any external organisation within a single financial year.

Gifts

Type of Gift	**Rules**	**Required Action**	**Notify for Register**
Trivial (including branded gifts) up to £50 in value	Acceptable if occasional.	None	No
Any other gifts over £50	Should not be accepted by an individual except where refusal could cause offense.	Complete Form for Receipt of Offers of Gifts or Hospitality	Yes

3. Hospitality

a) Invitations to lunch or dinner from an external organisation should only be accepted where the primary reason for accepting an invitation is to discuss business matters.

b) Invitations of a social kind (e.g. sporting and cultural events) should be declined except where the interests of the College can be clearly demonstrated in advance and the business justification is both compelling and exceptional. Acceptance must be agreed in advance in writing by a member of the Senior Leadership ~~Strategic Management~~ Team (SMT) and subsequently disclosed.

c) Hospitality that includes travel or overnight accommodation must not be accepted.

d) When an employee is speaking at an educational conference, and travel and accommodation is provided by the organisers, approval to accept and attend the conference should be obtained in advance from the appropriate line manager and a Vice Principal.

e) Repeated invitations are deemed to be inappropriate, and any employee who has accepted hospitality of a social kind (e.g. sporting and cultural events) from an external organisation should not accept any further invitations of a similar type from the same organisation within the following twelve months.

Hospitality

Type of Hospitality	Rules	Required Action	Notify for Register
Conventional Hospitality such as Lunches/ Dinners up to £50	Normally acceptable if in the interests of the College.	None	No
Conventional Hospitality such as Lunches/Dinners in excess of £50	Normally declined unless in the interests of the College. Declined if deemed to be excessive.	Complete Form for Receipt of Offers of Gifts or Hospitality	Yes
Other Hospitality (particularly sporting and cultural events)	Acceptable only if the interests of the College can be clearly demonstrated. Because of the external construction that is likely to be put on acceptance of invitations to sporting and cultural events, authorisation will be given only in compelling and exceptional circumstances.	Complete Form for Receipt of Offers of Gifts or Hospitality	Yes
Travel and accommodation	Not acceptable.	Complete Form for Receipt of Offers of Gifts or Hospitality	Yes
Travel and accommodation for education conferences	Acceptable if paid by the organisers for invited speakers.	Approval to attend required	Yes

Appendix 1

Gifts and Hospitality

Form for Receipt of Offers of Gifts or Hospitality

All Offers (whether accepted or refused) of Gifts or Hospitality in Excess of £50	
Name of Employee *(Recipient)*	
Job Title and Department	
Description of Gift/Hospitality Offered	
Date	
Name and Address of the External Organisation that has made the Offer	
Relationship to the Company	
Estimated Value	
Accepted/Declined	
Date Offered/Accepted/Declined	
Reason for Acceptance/Decline	
Employee's Signature	
Date of Notification	

Please return completed forms to Lisa Clark, Director of Corporate Services, Springburn Campus for recording on the central register. Thank you.