Engineering UTC
Northern
Lincolnshire

Gifts and Hospitality Policy

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Purpose

This policy sets out the procedure staff and Governors must follow when giving or receiving gifts and hospitality.

Scope

This policy applies to full time and part time employees on a substantive or fixed-term contract, and to associated persons such as Directors, secondees, agency staff contractors and others employed under a contract of service.

Policy Statement

Engineering UTC Northern Lincolnshire (ENLUTC) is committed to the highest level of integrity, honesty and accountability in all its business dealings. All staff, Trustees, and governors are expected to maintain high standards of propriety and professionalism in all their dealings, ensuring they are free from any conflict of interest through their business in the name of the UTC.

In order to protect all individuals associated with the UTC, and the reputation of the UTC from accusations of bribery or corruption staff and Trustees must take extreme care that none of their dealings, directly or indirectly, could be deemed as a reward or benefit, in line with the Prevention of Fraud and Bribery Act 2010. This Act makes it a criminal offence to: • offer, promise or give a bribe, • request, agree to or accept a bribe • (by an organisation) fail to prevent bribery by those acting on its behalf (‘associated persons’) to obtain or retain business or a business advantage for the organisation. Under this Act, a bribe is ‘a financial or other advantage’ offered, promised or given to induce a person to perform a relevant function or activity improperly, or reward them for doing so.

The UTC and each academy will hold a Gifts and Hospitality Register. All gifts/ hospitality over the value of £25 must be recorded in the Gifts and Hospitality Register.

It is your responsibility to ensure that you are not placed in a position that risks, or appears to risk, compromising your role or the UTC public and statutory duties. You should not be seen to be securing valuable gifts and hospitality by virtue of your job or role. You should not accept or provide any gift or hospitality if it gives the impression that you have been influenced or deemed to be influencing while acting in an “official capacity”.

You must declare all offers of gifts and hospitality, made to or by you, regardless of value, in your role as a member of staff or Governor at ENLUTC. All such offers must be declared *whether accepted or declined*. Offers of gifts and hospitality may include items ranging from diaries, wall charts, and boxes of chocolates, to free international travel and accommodation.

Declarations must be recorded on the Gifts and Hospitality Register (the register). The register is maintained by the Business Manager.

This policy also applies to spouses, partners or other associates if it can be argued or perceived that the gift or hospitality is in fact for the benefit of the official.

In exercising judgement as to whether to accept a gift or hospitality the question should be asked what public perception would be if the information was published given your role and circumstances.

Receiving gifts

You may retain all gifts valued at £25.00 or under when given in recognition of presenting at events or otherwise.

For gifts exceeding a value of £25, the decision on how to deal with the gift rests with the Principal/Accounting Officer. The following options are suggested:

- share the gift with all staff;
- raffle the gift for charity;
- donate the gift to charity; or
- make a donation to charity and keep the gift.

It is not uncommon that in various working environments gifts are exchanged between staff, for example at Christmas. In these circumstances, and providing that gifts have not been funded in any way by monies associated with the Academy, such gifts need not be registered.

Accepting offers of hospitality – genuine business reasons

Hospitality offered should only be accepted where there is a direct link to working arrangements and a genuine business reason can be demonstrated, for example:

- attendance or speaking at a conference, which provides complimentary subsistence, travel and accommodation (this does not need to be declared on the register except where a gift was received);
- attending at a free training course; or
- attending a drinks reception to network.

It is recognised that, in the course of carrying out your duties, you will need on occasion to ensure good relationships with existing and future customers, suppliers and stakeholders and that this may involve for example, the receipt of modest working lunches and dinners. These are acceptable where there is a genuine business reason.

Hospitality invitations to events which are purely social events should be considered very carefully before accepting; in such circumstances it may be much more difficult to substantiate a genuine business reason. You are expected to use annual leave for such events.

You may not accept free holidays from a current or potential supplier or customer. These invitations should be recorded in the register whether received or declined.

It is common for appreciative parents and pupils to register their thanks for the work of staff in the form of a small personal gift. If these are valued at less than £25 these are perfectly acceptable without reference to senior members of staff. These will not need to be recorded in the register.

Where a gift is received on behalf of the UTC, the gift remains the property of the UTC. The gift may be required for departmental display or it may, with the Principal's approval, remain in the care of the recipient.

Gifts are sometimes offered by suppliers with the purchase of items. All such special offer gifts are the property of the academy and must be registered and used accordingly.

Gifts and hospitality offered by ENLUTC

Staff must be mindful that the value of all gifts and hospitality offered by the UTC are sourced from public funding, and the expectation is that such funding will be used for legitimate purposes and demonstrate value for money.

It is acceptable to provide modest hospitality in the way of working lunches and/or dinners to existing and potential suppliers, customers and stakeholders subject to a genuine business reason.

Declaration

You should make your declaration by email as soon as possible after the offer or receipt of gifts or hospitality. All declarations are to go to the Principal in the required format as shown below. The declarations will be recorded in the register and will be available for inspection at any time.

Your declaration will need to include the following information:

- date of offer of gift or hospitality, and date of event where relevant;
- name, job title and organisation of recipient / provider;
- nature and purpose of gift or hospitality received or declined;
- the name of any other organisation involved;
- actual or estimated value.

Monitoring

The register will be reviewed as part of the UTC's Internal Audit reviews.

Staff will be reminded periodically of their requirement to declare gifts and hospitality provided/accepted/declined in accordance with this policy.

Policy breach

Staff and Governors who fail to declare the acceptance/provision/decline of hospitality and gifts in accordance with this policy may be subject to disciplinary action under the Disciplinary Policy.

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DECLARATION OF GIFTS AND HOSPITALITY OFFERED TO EMPLOYEES

Name of Employee

Who was/would have been the recipient of the gift/hospitality *(if not yourself)* and what is their relationship to you?

Who made the offer *[individual/company/organisation etc] and when?*

Give details of the gift/hospitality

What was its estimated value?

What was the purpose of the offer?

Did you accept or refuse the offer?

Is the individual/company/organisation dealing with you or the college in relation to any matters? If so, please give details

Are they providing goods/services to the college or hoping to do so in future?

I certify that to the best of my knowledge, I have complied with that guidance

Signature of Employee

Date of declaration