

Procedure Title: Gifts and Hospitality

Procedure Ref: AP/1SM/SP102

Approved By: Jane Murray

Responsible Person: Jane Murray

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Approval date: 20/09/2023

Signature: *Michael Priestley*

1 Scope and Purpose

This policy and procedure applies to all Governors, staff, students, contractors and suppliers and other stakeholders.

1.1 The purpose of this policy and procedure is:

- To help prevent allegations of bribery by highlighting the importance of procedures in respect of gifts and hospitality;
- To give guidelines to staff who may be offered gifts and hospitality, as to what might be considered acceptable and where to seek further advice;
- To ensure transparency by formally recording gifts and hospitality, where they are received.

2 Policy Statement

2.1 As required by the Bribery Act 2010, it is the policy of Lakes College to conduct our activities in an honest and ethical manner. We take a zero-tolerance approach to bribery and corruption, and expect the highest standards of propriety in the conduct of business.

2.2 All Governors and members of staff have a responsibility to protect the reputation of the College and should exercise extreme caution in the receipt of gifts and hospitality and managers should ensure that staff are aware of their responsibilities. This policy should help protect Governors and staff from allegations of impropriety.

- 2.3 Where gifts and hospitality are received, the College is fully committed to ensuring transparency by maintaining a register of gifts and hospitality and will adopt a zero-tolerance approach to non-compliance, which may give rise to disciplinary action.

3 Acceptance and Registration of Gifts and Hospitality

- 3.1 The giving and receiving of modest hospitality and token gifts, where this is done to build relationship and networks and there is no risk of it being misconstrued, is acceptable within the limits of defined in this procedure, except where

- the frequency of the gift or hospitality could give rise to a significantly greater sum when aggregated;
- the context and timing of the hospitality might be reasonably taken as being influential (for example during a procurement exercise);
- the nature of the relationship between the provider/host (including students) and the College could be misconstrued;
- the nature of the gift and hospitality could give rise to adverse comment;
- the perceived value of the gift or hospitality is greater than the actual cost to the provider/host.

- 3.2 Gifts or hospitality with a value of less than £30, need not usually be registered although if a Governor or member of staff feels that it would be prudent, they are encouraged to do so.

Gifts and hospitality greater than £30 should be cleared by a line manager and registered with the Clerk via e-mail, janem@lcwc.ac.uk, who will maintain a formal register. Where further advice is required on gifts and hospitality, the Deputy Principal or the Clerk can advise.

Where acceptance of a gift or hospitality could give rise to suspicion of a conflict between the performance of official duties and personal interest, it should always be declined, irrespective of value.

Where acceptance of a gift of hospitality could give rise to suspicion of conferring advantage on a learner, individual or company, it should always be declined irrespective of value.

Summary:

- You should treat with caution any offer of gifts and hospitality and ask yourself, why is this offer being made?
- You should refuse any gift or hospitality which might be perceived as influencing your decisions or actions;
- You should always consider whether the donor is in, or seeking to enter into, a business or contractual relationship with the college;

- Under no circumstances should gifts or hospitality be accepted from anyone currently tendering or about to tender for a contract;
- Under no circumstances should personal gifts of cash be accepted, irrespective of value;
- You should report immediately to your line manager any inducement which could give rise to accusations of impropriety;
- All gifts and hospitality accepted above £30 should be formally registered;
- Refusals should be courteous, but firm and the donor informed of College policy.