



# ETC International College

## Gifts and Hospitality Policy

March 2020

### Introduction

The purpose of this policy is to ensure that the College complies with the high standards of transparency that are an integral part of the College's culture, specifically with regard to interaction with parents and third parties who are current or potential suppliers of equipment, goods and services.

This policy covers the giving of, or acceptance by, Governors and any workers of gifts and hospitality from third parties, namely individuals who are not Governors or workers, but who are current or potential students, parents of current or potential students, or current or potential suppliers of equipment, goods and services.

For the purpose of this policy, hospitality includes the provision or acceptance of lunches, dinners, holidays and tickets to sporting, social or leisure events. These examples are not exhaustive.

### Scope of this policy

This policy applies to Governors only to the extent of gifts or hospitality involving third parties who have any current or potential association with the College.

This policy applies to all workers.

### Principles

The College's general principles for the provision or acceptance of gifts or hospitality are as follows:

- gifts and hospitality must never be solicited;
- the value of the gift or hospitality must not be such that there could be any reason for it to be regarded as being outside normally acceptable practice or out of line with the standard of behaviour expected by the College;
- the gift or hospitality must be given or received for an appropriate reason and gifts and hospitality which could be perceived as an incentive or bribe must never be accepted; the gift or hospitality must be of a one-off or irregular nature, such that it could not be viewed as a regular source of income by Her Majesty's Revenue and Customs.

If in doubt as to whether to receive or give gifts or hospitality, refer to the Chair.

## Procedure

### Giving or accepting gifts with a value of £100 or under

Gifts offered by or to suppliers of equipment, goods and services, or to or from any other third parties with an interest in the College, e.g. students, with an estimated value of £100 or under can be accepted, provided:

- the gift is not given or received with an expectation (by either party) that there is an obligation owed as a result of the gift;
- the total value of the gift given or received from any one third party in any twelve month period does not exceed £100;
- it is appropriate in the circumstances (for example, it is customary for small gifts to be given by students to teachers on completion of their course); and
- the receipt of the gift is notified to the College as set out below.

### Giving or accepting gifts with a value above £100

All gifts offered by suppliers of equipment, goods and services, or to or from any other third parties with an interest in the College of a value in excess of £100 shall be reported promptly by email, as set out below, and may not be accepted save as to comply with cultural norms and, if that is the case, the gift must be handed over by the recipient to the College.

### Giving or accepting hospitality

Hospitality given to or offered by suppliers of equipment, goods and services, or from any other third parties with an interest in the College shall only be permitted if:

- the hospitality is not given or received with an expectation (by either party) that there is an obligation owed as a result of the hospitality;
- the hospitality cannot be viewed as an incentive or bribe; and
- the hospitality is appropriate or proportional to the nature of the relationship with the supplier or third party. Examples of what might be considered appropriate and what might not be considered appropriate can be found in the Annex to this policy.

### Duty to notify the giving of or acceptance of gifts and hospitality

All gifts or hospitality with a value of £100 or below, given to or received from suppliers of equipment, goods and services, or from any other third parties with an interest in the College, to or received from Governors or workers, shall be reported promptly by email to the Chair of the Board of Governors who shall make and maintain an appropriate record in the 'Bribery book' kept by the Chair.

**Duty to notify refusal of gifts and hospitality**

All offers of gifts or hospitality with a value above £100 declined on the basis that acceptance would create a sense of obligation, or which could be viewed as an incentive or bribe, shall be reported promptly by email to the Chair who will make and maintain an appropriate record in the 'Bribery book' kept by the Chair.

**Content of records**

Records should show a brief description of the gift or hospitality, including its estimated value, the date on which it was offered and/or received, the reason for the gift or hospitality, the third party involved, and whether the gift or hospitality was accepted or declined.

Version number: V1.0

Approved by: Board of Governors

Date for review: March 2023



**ANNEX 1  
EXAMPLES**

Examples of hospitality that would be acceptable are:

- A working lunch with a supplier of services to the College, valued at no more than £100 for two people.
- A pre-notified and agreed lunch with a significant third party (donor, or other), valued at no more than £150 for two people.

Examples of hospitality that would not be acceptable are:

- An invitation from an agent for overseas borders for a Governor or worker and their partner to be put up for free in a five star hotel for three days, following the Governor or worker's attendance at a recruitment fair abroad, worth more than £1,500, which should not be given or accepted.



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### Confirmation of Reading

I confirm I have read and understood the **Gifts and Hospitality Policy**

Name: \_\_\_\_\_

Signed: \_\_\_\_\_

Date: \_\_\_\_\_