



ST MICHAEL'S CATHOLIC COLLEGE GIFTS AND HOSPITALITY PROCEDURE 2018-20

The college is required by Southwark Colleges financial procedures to keep a register of gifts and hospitality.

A gifts and hospitality procedure seeks to protect staff and governors from suspicion of dishonesty and ensure that they are free from any conflict of interest with respect to the acceptance of gifts, hospitality, or other inducement from suppliers.

The principle of integrity requires that Trustees and staff should not place themselves under an obligation that might influence, or be perceived to influence, the conduct of their duties. This means that the receipt of hospitality and gifts must be subject to clear restrictions and that any that are accepted must be declared and recorded.

HOSPITALITY

Hospitality can be defined as any food, drink, accommodation or entertainment provided free of charge or heavily discounted.

You should never accept lavish hospitality that could be interpreted as a way of exerting an improper influence over the way you carry out your duties. Nor should you offer such hospitality to others on behalf of St Michael's Catholic College.

When you have to decline hospitality, you should be courteous but firm, and draw the attention of the person making the offer to the existence of this policy. If necessary, you should pay your share of any costs, and claim these in the ordinary way.

You may accept modest working meals and light refreshments without making any declaration. Other hospitality may be accepted, for instance where there is a genuine need to impart information or represent St Michael's Catholic College in the community or it concerns the attendance of a relevant conference or course.

Before accepting any hospitality, approval should be sought from the Principal in respect of employees. All hospitality received must be recorded in the gift and hospitality register with the exception of working meals, receptions etc.

GIFTS

Gifts are items given or received for which no payment was made.

You must not accept cash, or personal gifts with a significant monetary value, under any circumstances, although items of nominal value, (i.e. approximately £30 or below) may be accepted.

Gifts of low intrinsic value such as calendars or diaries can be accepted. If there is any doubt as to whether the acceptance of an item is appropriate, staff should decline the gift or refer the matter to their line manager.

When you have to decline a gift, you should be courteous but firm, and draw the attention of the person making the offer to the existence of this policy.

GENERAL

Where approval is granted any gift or hospitality received with an equivalent value of **£30 or over** must be recorded in the college's register of gifts and hospitality. The Head of Administration will maintain the register, the Principal and Chair of governors will sign off the register at the end of the financial year.

The following details should be recorded.

- Nature of gift/hospitality. In the case of a gift, it should be specified whether it is a personal gift or a gift accepted on behalf of the college.
- Value of gift/hospitality.
- Name of firm/individual concerned.
- Date gift/hospitality accepted.
- Name of employee/Governor.

The entry containing the information should be signed by the recipient and countersigned by the Head of Administration.

In the case of Governors any gifts or hospitality received relating to their connection with the college should be recorded in the Register of gifts and hospitality.

The register is kept in the Head of Administration's office and is available on request. It is the personal responsibility of staff and Governors to declare any receipt of gifts and hospitality covered under this procedure.

June 2018

Signed:

Chair of the Governing Body

Review Date: 2020