



**Greenhead College  
Corporation**

**GIFTS  
AND HOSPITALITY  
POLICY**

*Reviewed April 2020*

## GIFTS AND HOSPITALITY POLICY

Employees and Governors of the College must be above the suspicion of receiving gifts or hospitality which might be construed as inducement, and contrary to the standards of conduct expected. It is not always, however, possible or desirable to decline offers: guidance follows.

1. With regard to Gifts and Hospitality for members of staff and governors at the College, the following should be politely refused and not accepted under any circumstances:
  - a) *Gifts of money (this does not include corporate endowments/donations to the College itself);*
  - b) *Free membership or subscriptions (eg sports or other clubs);*
  - c) *Foreign travel unless as a specific element of a College activity. 'Holiday' type offers are unacceptable.*
  - d) *Free goods or services such as are normally provided by a supplier to the College at a charge;*
  - e) *Other free equipment or goods or services such as cars, housing or electrical equipment, etc.*
2. Any offers falling in to any of the above categories should be rejected and notified immediately to the Clerk to the Corporation, who will take any action thought necessary with the offerer.
3. The following one-off gifts with a value below £50, or £10 from a student or parent, are acceptable. Any gift above these values should be referred to a member of SLT:
  - a) *Occasional lunches or dinners;*
  - b) *The receipt of seasonal or, for instance, end of contract expressions of gratitude from suppliers and contractors by way of items such as boxes of chocolates or individual bottles of drink;*
  - c) *Incidental items such as calendars, diaries, pens, cheap calculators, usually carrying advertising material;*
  - d) *Occasional corporate events such as local sporting fixtures, provided that these do not involve excessive extra travelling at the College's or the donor's expense.*
  - e) *One-off small gifts of gratitude from students/parents below a value of £10*
4. Any offer not falling in to any of the above should be notified to the Clerk to the Corporation and recorded in the Register of Corporate Gifts and Hospitality.
5. If in doubt seek guidance first from the Clerk to the Corporation.
6. Fraud, Bribery & Corruption

The Fraud Act 2006 introduces a new offence of fraud, which can be committed in three ways:

- Fraud by false representation
- Fraud by failing to disclose

- Fraud by abuse of a position of trust

All offences occur where the act or omission is committed dishonestly and with intent to cause gain or loss. The gain or loss does not have to succeed, as long as there is intent.

The Bribery Act 2010 makes it a criminal offence to bribe or be bribed by another person by offering or requesting a financial or other advantage as a reward or incentive to perform a relevant function or activity improperly performed.

Further information, including how to raise concerns, is included within the Anti-Fraud, Anti-Bribery and Anti-Corruption Policy.

<i>Author:</i>	<i>Clerk and Corporation</i>
<i>Date drafted:</i>	<i>May 2009</i>
<i>Date accepted by committee:</i>	<i>November 2015</i>
<i>Date accepted by the Corporation:</i>	<i>December 2015</i>
<i>Reviewed and Updated by</i>	<i>April 2020 DFR</i>
<i>Date of next review:</i>	<i>April 2023</i>

***“This policy has been impact assessed to ensure it complies with all aspects of Equality and Diversity. Members are reassured that this policy is compliant with current equality legislation”.***

<b>Name</b>	<b>Details of Gift</b>	<b>Further action</b>

Name	Details of Gift	Further action