



Donations, Gifts, Hospitality and Sponsorship Procedure

October 2023

History of Changes

Version	Description of Change	Authored by	Date
1.1	History of changes added	K Robb	31 October 2023

Procedure for Donations, Gifts, Hospitality and Sponsorship

The Anti Bribery Policy details the Colleges policy for the giving and accepting donations, gifts, hospitality and sponsorship. The policy can be found by clicking [here](#). This policy applies to all College employees.

The procedure below should be followed to ensure the policy is adhered to. The giving and accepting of gifts is allowed if the following requirements are met:

- (a) It is not made with the intention of influencing a party to obtain or retain business or a business advantage, or reward the provision or retention of business or a business advantage, or in explicit or implicit exchange for favours or benefits.
- (b) It is given or received in the College's name.
- (c) It does not include cash or a cash equivalent (such as gift vouchers).
- (b) It is appropriate in the circumstance, taking account of the reason for the gift, its timing and value.
- (e) It is given openly, not secretly.
- (f) It complies with any applicable local law.

The policy allows, reasonable and appropriate hospitality or entertainment given to or received from third parties, for purposes of:

- (a) Establishing or maintaining good business relationships.
- (b) Improving or maintaining our image or reputation.
- (c) Marketing or presenting our products and/or services effectively.

Consideration should be given to who is the most appropriate individual or department to participate. This will be dependent on the nature of the offer, and it may be appropriate to pass to others who will gain more benefit for the College from the development of the business relationship, or if more relevant to the department's activities. As a guide:

- Where the purpose is the development of a strategic partnership or alliance, or the whole College will benefit, then it is likely that the most appropriate attendee is a senior manager.
- Where the purpose is the development of more specific business relationship, or that a single department will benefit, then it is likely that the most appropriate attendee is a middle manager or relevant staff member.

All personal or corporate gifts over the value of £20, which will not be utilised for curriculum delivery, should be handed into the Executive office. The SLT will then agree the most appropriate utilization of the gifts.

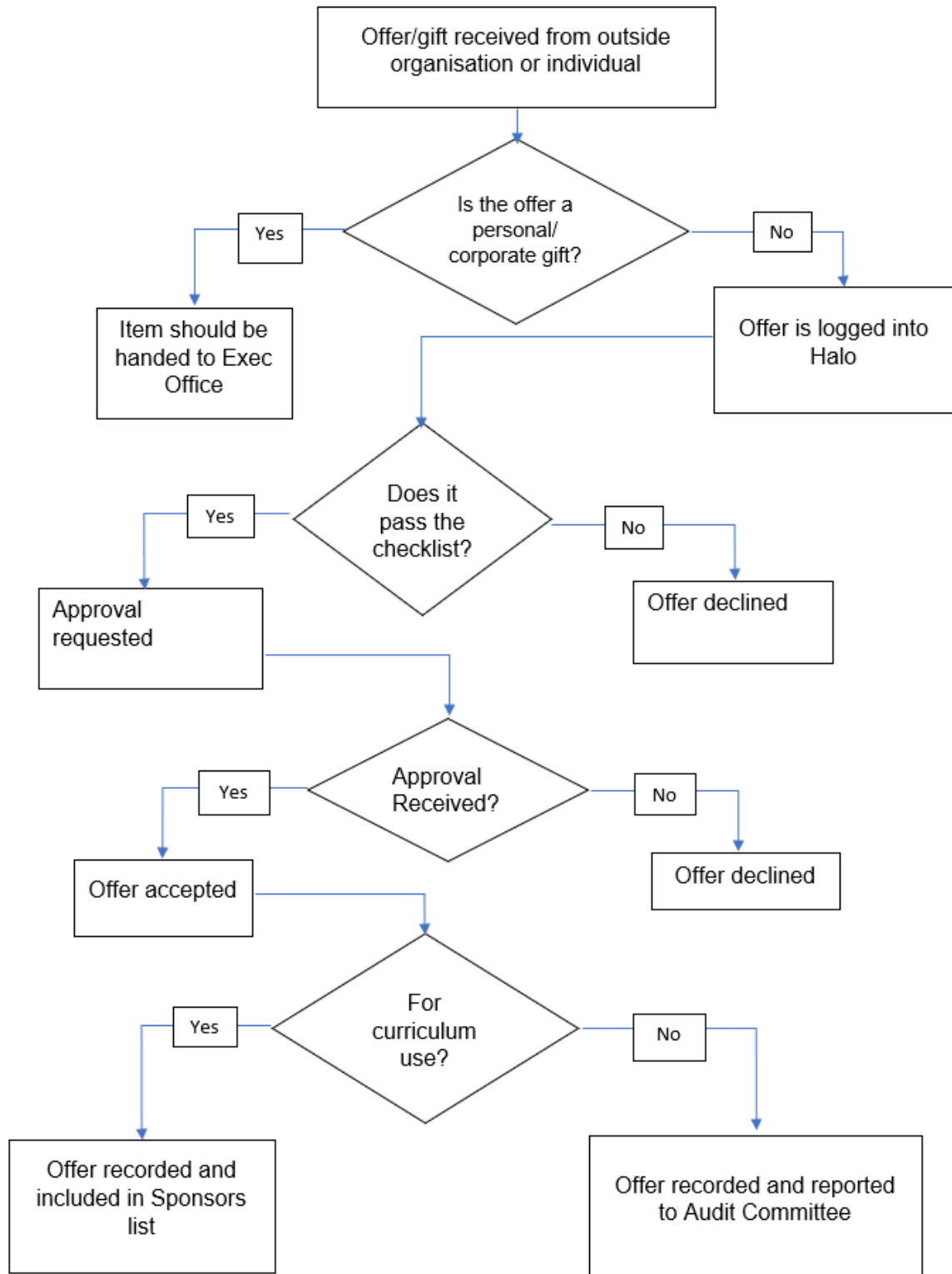
All donations, gifts, hospitality (over £20) and sponsorship should be logged via Halo and no offers should be accepted without the approval of the Principal or Vice Principal – Finance & Corporate Services. Offers to the Vice Principal – Finance & Corporate Services will require approval of the Principal and offers to the Principal will require approval from Chair of the Board. The Executive will monitor the frequency and number of offers made to individuals and from companies. This will include both accepted and declined. All gifts offered will be reported to the Audit Committee.

The following will be considered by the Executive when considering offers:

- The standalone value of any gifts or hospitality received if above the current threshold of £20.
- The frequency of these gifts or hospitality if they are received from the same company.
- The accumulated value of these gifts or hospitality if they are received from the same company in a 1-2 year period.
- Who benefits from these gifts or hospitality? Is it mainly one person a small group or is it dispersed across a number of people?
- If it is one person or a small group what is the accumulated of these gifts or hospitality across a 1-2 year period.

The lists above should be used as the checklist for approves to consider prior to giving or declining approval.

The flow chart in Appendix 1 details the procedure for all offers.



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