K

BORDERS COLLEGE REGIONAL BOARD

AUDIT & RISK COMMITTEE

30 November 2023

Register of Gifts & Hospitality Update

1.0 PURPOSE OF PAPER
For information

1.1 This report provides the Committee an update on the gifts and hospitality offered during the period 1 September 2023 and 20 November 2023.

2.0 EXECUTIVE SUMMARY

2.1 There has been one offer of hospitality accepted during the reporting period and one offer declined.

2.2 The procedure note and launch of the self service portal was been launched 8th November. The use of the portal will allow improved reporting and monitoring of offers for both individual and the curriculum.

3.0 RECOMMENDATION(S)/ACTION(S) REQUIRED

3.1 **It is recommended the Committee to note the additions made to the Register of Gifts during the reporting period.**

4.0 BACKGROUND

4.1 The Audit & Risk Committee provides assurance to the Board that "appropriate measures" are in place for a key number of governance and control activities. This includes the governance and oversight of the Register of Gifts which is maintained in accordance with the Financial Regulations.

4.2 The Financial Regulations and the Anti-Bribery policy require any gifts or hospitality of value, in excess of £20, to be approved by either the Principal or Vice Principal and recorded in the register.

4.3 The Terms of Reference for the Audit & Risk Committee require any updates to the Register of Gifts to be reported to the Committee and is a standing item on the Committee agenda plan.

5.0 GIFTS & HOSPITALITY UPDATE

5.1 The table over details additions to the Register of Gifts during the period 1 September to 20 November. All gifts accepted have been authorised in accordance with the approved procedures.

Date	Staff member	Company	Gift/Event	Value	Authorised by
8/11/23	Craig Ramsay	Muirhall Energy	Awards Ceremony – Edinburgh	100.00	K Robb, VP Fin & Corp

5.2 There was one hospitality offer declined during the period.

5.3 The revised Policies approved at the Committee on 11 May 2023 are available on the Colleges website and all staff have been advised to ensure they have read the policies and are adhering to them. This message was reinforced at the Principals Welcome Back address on 15 August.

5.4 The attached procedure note has also been written to sit alongside the policy and is available on the Colleges Website. An email was sent to all staff on 8th November to launch the change in the reporting process to now be via the Self-Service portal and the inclusion of the Procedure note on the website.

6.0 IMPLICATIONS AND CONSIDERATIONS

6.1 Financial Implications

There are not financial implications from this report.

6.2 Learner Implications

There are no direct learner implications from the contents of this report.

6.3 Staff Implications

The contents of this report provide assurance the procedures are being followed by staff.

6.4 Equality and Diversity Implications/Equality Impact Assessment

There are no direct equality or diversity implications from the contents of this report.

6.5 Sustainability/Environmental Implications

There are not direct sustainability or environmental implications from the contents of this report.

7.0 RISK COMMENTARY

7.1 The monitoring and reporting of gifts and hospitality ensure the College is adhering to its Anti-Bribery Policy and reducing the risk of bribery or corruption within the College. The move to logging all offers into the Self Service portal will improve the system for staff to log any offers and for increase analysis of the offers received.

8.0 CONCLUSION

8.1 There has been one offer of hospitality accepted and one offer declined during the reporting period.

Kirsty Robb, Vice Principal Finance & Corporate Services

Previous Board or College Committee Approvals: Audit & Risk Committee 23 Oct 2023

Alternative formats

If you need access to a college document in an alternative format, for example, accessible PDF, large print, easy read, audio recording and braille:

- Complete an accessibility request form by **clicking on this link**.
- Call **01896 66 26 00** and ask to speak with the Marketing Team.

We will consider your request and get back to you within 5 working days.

Translate documents from this website into other languages

You can download any of our published documents and translate them into many languages. Please click this link to use **Google Translate**

For publication ☒	**Not for publication** ☐ **If not, why not?**

BORDERS COLLEGE

Procedure for Donations, Gifts, Hospitality and Sponsorship

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 approportionate 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.

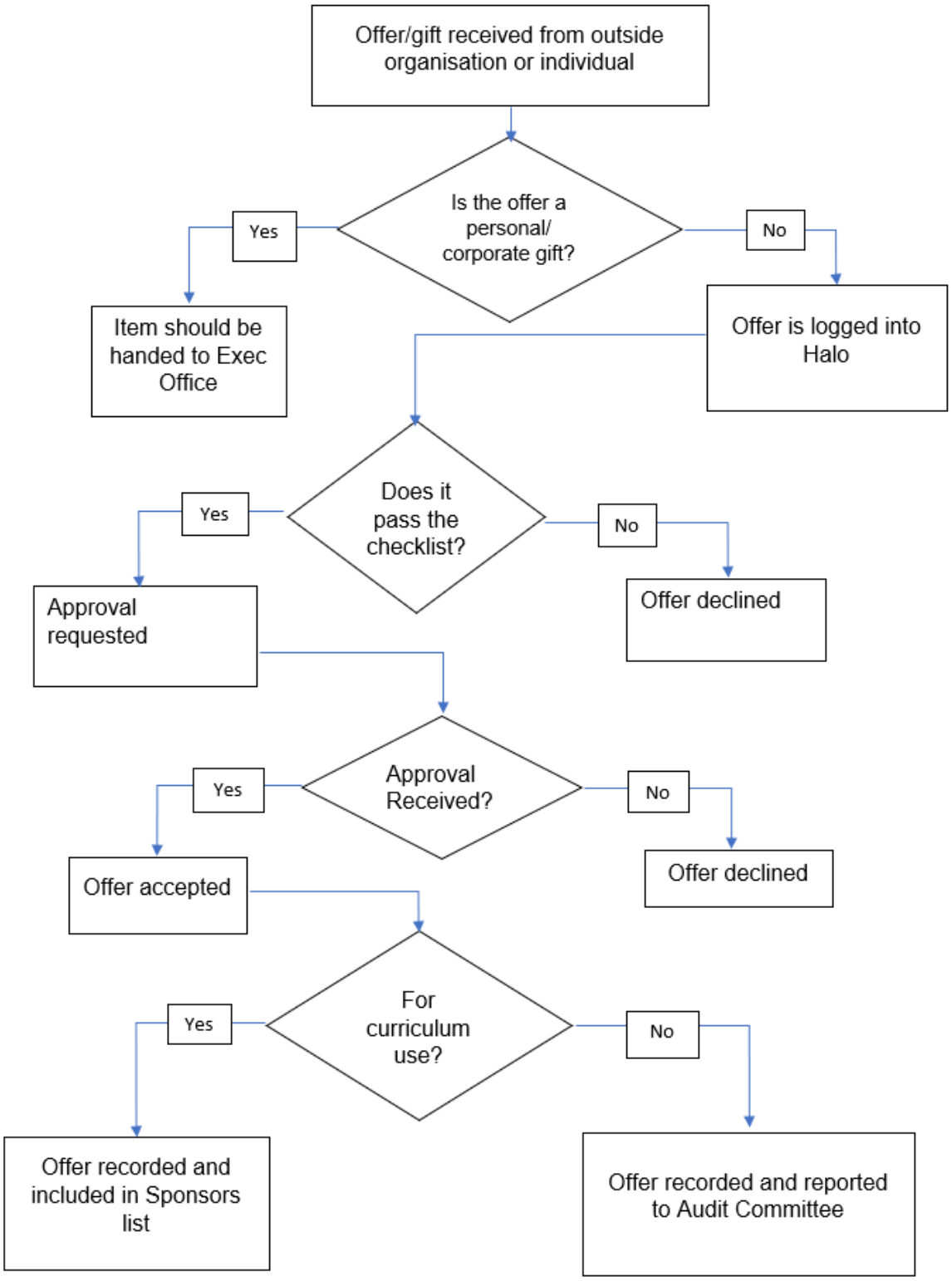
The following will be considered by the Executive when considering offers:

- 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.

Appendix 1



Status:	Approved by Audit Committee
Policy Dated:	October 2023
Author:	Vice Principal – Finance and Corporate Services
Review Date:	July 2025
Equality Impact Assessed:	Yes