

LINK19 College



GIFTS & HOSPITALITY POLICY

Reviewed Date: Summer 2024

Review Date: Summer 2027

LINK19 College LTD
Gifts and Hospitality Policy

Introduction

1. The offer, or acceptance, of gifts or hospitality by LINK19 College staff or LINK19 College directors can cause potential reputational harm to LINK19 College. In particular, it is contrary to the standards of conduct expected to canvass or seek gifts as an inducement or reward, or to accept any fee or reward other than salary. The LINK19 College LTD Gifts and Hospitality Policy accordingly applies to LINK19 College staff and directors. The Policy has been approved to ensure compliance with anti-bribery legislation.

Requirements

2. Hospitality. It is not always possible or desirable to reject offers of hospitality, for example, attending a function in an official capacity, or having a working lunch. Hospitality in these circumstances is defined as any seminar, conference, event, lunch/dinner or other form of food, drink or entertainment provided without, or at a significantly reduced charge, by an individual, group, or organisation other than LINK19 College. Hospitality should only be accepted when it is reasonably incidental and appropriate in the circumstances.
3. Gifts. Gifts are items of value, other than cash or other monetary or equivalent payment, for example, book tokens or chocolate. When gifts are offered to staff in return for contributions to events, such as speaking engagements, gifts may be accepted provided that the total value of gifts does not exceed £30.
4. Other staff gifts of a total value greater than £30, for example, by contractors, suppliers, parents, or learners should be declined with a polite refusal. Where refusal of total gifts under the value of £30 might cause difficulties, the instance should be reported to the LINK19 College Company Secretary to determine under what circumstances the gifts might, justifiably, be retained.
5. Under no circumstances should cash be accepted.
6. LINK19 College staff and LINK19 College Directors are not permitted to offer gifts or non-incidental hospitality.
7. LINK19 College Directors will not accept any gifts or non-incidental hospitality, nor canvass nor seek gifts or non-incidental hospitality.
8. All gifts and hospitality are required to be registered with secretary@link19college.ac.uk.

Responsibilities

9. It is the personal responsibility of LINK19 College staff and directors to immediately declare all gifts and hospitality, as applicable, *whether accepted or not*.
10. If you are in any doubt about the refusal or acceptance of hospitality or gifts, the query should be referred to secretary@link19college.ac.uk.
11. Breach of the LINK19 College Gifts and Hospitality Policy may result in disciplinary proceedings or board removal.

Procedures

12. The following requirements will apply in determining the acceptability and extent of hospitality:
 - hospitality should be accepted only if directly relevant to the individual's LINK19 College responsibilities
 - hospitality must not be accepted if this is seen as compromising the individual's LINK19 College position in connection with contractual commitments or negotiations
 - any doubts regarding the appropriateness of gifts or hospitality should be referred to secretary@link19college.ac.uk.

Gifts and Hospitality Register

13. The Gifts and Hospitality Register is to be kept by the LINK19 College Company Secretary. Anyone wishing to make an entry into the Register should contact secretary@link19college.ac.uk.

Donations

14. Donations are things, e.g., cash or items, that are given to LINK19 College as opposed to a gift to an individual. Subject to discretion and legal compliance, donations should only be accepted by the LINK19 College Lead upon consultation with, as appropriate, the LINK19 College Chair/Board.

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