



TITLE	REF	VERSION
Gifts and Hospitality Procedure	GOVPRO006	2.0

DEPARTMENT	Governance		
DATE	21 April 2022	REVIEW DATE	20 April 2023

GIFTS AND HOSPITALITY PROCEDURE

Procedure statement

Activate Learning is committed to the highest standards of ethics, professionalism, and best practice in corporate governance. We conduct our business in line with the Nolan Principles of Public Life: selflessness, integrity, objectivity, accountability, openness, honesty, and leadership.

We conduct ourselves with integrity, impartiality, and honesty at all times, and we are all expected to maintain high standards of propriety and professionalism. This includes avoiding situations where we could be open to suspicion of dishonesty, and not putting ourselves in a position of conflict between official duty and private interest.

Scope

This procedure applies to members of the Activate Learning Corporation Board and any subsidiary boards (“members”), and all individuals working for Activate Learning, including managers, employees, contractors, and volunteers (“staff”).

Definitions

For the purposes of this procedure, terms are defined as follows:

Gift: *Any money, products or services provided free of charge, including cash, memberships or subscriptions, trips or holidays, equipment, or goods, and incidental or promotional items, such as calendars, diaries, pens or foodstuffs.*

Hospitality: *The free of charge provision of travel, accommodation, food or drink.*

“Acceptance” or “receipt” of gifts and hospitality includes acceptance or receipt of such benefits by a spouse or close family member.

Responsibilities

The **Group Executive Team** is responsible for ensuring that there is a process in place to allow employees to comply with the procedure.

The **Director of Governance** is responsible for maintaining a record of all declarations of gifts and hospitality and providing assurance as necessary that gifts and hospitality have been declared.

All members and staff are responsible for ensuring that they record any gifts or hospitality they receive or give in the course of their work with Activate Learning. In certain cases, this includes declaring and surrendering any gifts or hospitality, as outlined in this procedure. Due to the severity of issues covered, breaches of this procedure may result in disciplinary action under the [Staff Disciplinary Procedure](#).

Expectations of staff and members

As members and staff, we act as representatives of and ambassadors for Activate Learning and are therefore expected to always demonstrate the organisation’s values and commitment to propriety. This includes avoiding circumstances which may give rise to suspicion of conflict between our official duty and our private interest. It is important that we take care not give the impression to the public, other staff, or suppliers that our decisions may have been influenced by a gift or hospitality.

Members and staff are therefore prohibited from accepting any gifts, rewards or hospitality which might cause them to be, or to be deemed by others to have been, influenced in making a business decision because of accepting such a benefit. This includes any gifts, rewards, or hospitality offered by any organisation or individual in the course of their work with Activate Learning.

Circumstances where gifts and hospitality may be accepted

Members and staff may, under the conditions set out in this procedure, accept offers of gifts, benefits, and hospitality. It is important that we carefully consider the circumstances under which we accept gifts, and whether this may create a conflict of interest or adverse inference against the integrity of either party. Members and staff must act, and must be seen to be acting, in a way which is fair, impartial, and unbiased.

You are expected to apply your professional judgement when considering whether to accept gifts and/or hospitality. Generally, gifts and hospitality are acceptable under the following circumstances:

- where hospitality is of nominal value and provided secondary to working arrangements, such as working meals and refreshments during meetings and events attended on behalf of Activate Learning;
- where the gift is of purely token promotional/advertising value and given to a wide range of people;
- where corporate endowments/donations are made to Activate Learning itself; and
- occasional corporate events, if these do not involve excessive travelling at the expense of Activate Learning or the donor.

Care should be taken with any gift or hospitality from a party which has, or is hoping to have, a contract with Activate Learning. You should seek the approval of your line manager (or Chair of the Board for members) before accepting any gifts or hospitality with a singular or cumulative value of over £250.

Where it is not possible to gain approval in advance, retrospective approval shall be sought.

Circumstances where gifts and hospitality may not be accepted

Due to increased risk of adverse perceptions, the following benefits should **not** be accepted by staff or members:

- gifts of money, including redeemable vouchers. If a monetary gift is offered, the recipient may ask for it to be donated to a charity of their choice;
- free membership or subscriptions (e.g. sports or other clubs) where there would normally be a charge;
- foreign travel which is not a specific element of a business, academic or research activity;
- free goods or services such as are normally provided by a supplier to Activate Learning at a charge;
- other free equipment or goods or services such as cars, housing, or electrical equipment;
- any gifts from suppliers offered during a procurement adjudication period; and
- any gifts or rewards offered as an inducement either for doing something or not doing something in your professional capacity.

Any such offers falling should be politely declined and notified immediately to the Director of Governance, who will take any action thought necessary with the donor.

If you are unsure whether to accept an offered gift or hospitality, you should seek advice from your line manager or the Director of Governance.

Under exceptional circumstances, you may seek authorisation from the CEO or Chair of the Board to accept of such gifts or hospitality by contacting the Director of Governance.

Exceptional authorisation may be granted where it is considered that such gifts should not be refused for the maintenance of good working relations. Any such decision shall be made in consultation with the Director of Governance and with due consideration of conflicts of interest and public perception.

Recording gifts and hospitality

If you accept any gifts or hospitality with a singular or cumulative value of over £50, you must notify the Director of Governance at the earliest opportunity via the Notification of Gifts and Hospitality Form (Appendix 1).

Declared gifts and hospitality will be recorded on the Register of Gifts and Hospitality, which is open to inspection by the auditors and may be released in accordance with Freedom of Information requirements.

References

This Policy complies with the following legislation:

- [Bribery Act 2010](#)

This Procedure should be read in conjunction with the following Activate Learning Policies and Procedures:

- [Corporate Ethics Policy](#)
- [Bribery and Corruption Procedure](#)
- [Conflicts of Interest for Staff Procedure](#)
- [Conflicts of Interest for Governors Procedure](#)





GIFTS AND HOSPITALITY FORM

PERSONALIA

Name:	
Email:	
Role/position:	
College:	

GIFTS AND HOSPITALITY RECEIVED

Date	Nature of Gift	Donor	Estimated Value

Signature of recipient:

Date:

Counter signed:

(Director of Governance)



DONATIONS AND SPONSORSHIPS FORM

PERSONALIA

Name:	
Email:	
Role/position:	
College:	

DONATION/SPONSORSHIP MADE/RECEIVED

Donation/sponsorship made/received
Details
Amount
Area of the business affected
Link to written record

To the best of my knowledge, the above information is complete and correct.

The donations/sponsorships were made/received in accordance with Activate Learnings Corporate Ethics Policy.

Signature of recipient:

Date:.....

Counter signed:

(Director of Governance)