



UTC Cambridge Gifts and Hospitality (Staff) Policy

Lead member of SLT: HRM/Business Manager (Elizabeth Andrews)
Designated Governor: Finance and Audit Committee Chair (Scott Haldane)

Legislation and reference:

EFA Academies Financial Handbook [Academies Financial Handbook 2015 - Publications - GOV.UK](#)
Bribery Act 2010
Education Act 2002

Associated documentation

UTC Cambridge Finance Manual (February 2016)
UTC Cambridge Fraud and Bribery Policy
UTC Cambridge Whistle blowing Policy

UTC Cambridge Vision

UTC Cambridge: Delivering Future Scientists

UTC Cambridge Mission

Through an innovative curriculum, developed with leading scientists from industry and academia, UTC Cambridge builds bespoke learning solutions delivered in a state of the art science and technology environment that empowers students to manage their academic and career development.

UTC Cambridge Values

We set ourselves challenging goals, are agile and resilient, to achieve our personal best.
By respecting one another we enhance our experience and benefit from different perspectives.
We take individual responsibility, ensuring team delivery.
By respecting our environment, our world, we make a difference.
We celebrate positive contribution and aspire to excellence.
We are morally and ethically responsible in scientific and environmental innovation.

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1. Aims and Objective of the Procedure

- 1.1. UTC Cambridge (hereafter UTCC) is aware that in the course of its teaching and business transactions with either students, parents, companies or external contacts, there may be occasions where staff are offered gifts or hospitality. Employees must be aware of the potential for the legitimate use of the gift or hospitality to be misinterpreted and this policy aims to prevent any improper behaviour arising, especially in light of the Bribery Act.

- 1.2. This policy seeks to clarify the conduct UTCC expects from its employees when they provide or are offered gifts or hospitality and it applies to all staff.
- 1.3. This policy covers any gifts, donations of equipment or hospitality provided by Partners

2. Scope of the Procedure

- 2.1. UTCC operates in pursuit of its mission and values to achieve excellence in every area of its teaching. Integrity and fairness, both actual and perceived, are vital to its success in achieving this mission. UTCC staff and representatives must act and seen to act at all times in a manner that is fair, impartial and without favouritism or bias.
- 2.2. UTCC will take firm action against any identified breaches of this policy or its associated procedures. Where this involves UTCC staff acting on its behalf this may include disciplinary action depending upon the nature and severity of the breach.
- 2.3. This procedure applies to all UTCC Staff and Students.
- 2.4. Gifts and hospitality shall always be received and acknowledged openly without any degree of secrecy attached.

3. Gifts

- 3.1. Employees are required not to solicit any gifts, reward or advantage while on UTCC business, under any circumstances and at all times.
- 3.2. UTCC does not encourage the acceptance of gifts from students or their relations. However there may be occasions when students make token gifts to staff, such as a box of chocolates or similar of low intrinsic value in appreciation of the support received which employees feel unable to refuse. Employees may accept such gifts but are advised to declare them to their line manager.
- 3.3. If a student offers or delivers a gift to an employee, which could be misinterpreted by others, they are advised to politely refuse and return the gift immediately to the sender explaining the UTCC policy as the reason.
- 3.4. Employees may accept gifts of token value, less than £10.00 such as pens, diaries, calendars or other promotional materials from external contacts. These should be declared to their line manager. Other gifts would be considered unacceptable.
- 3.5. It is also advisable not to accept offers of gifts from the same individual or organisation on a frequent basis as this could be misinterpreted.
- 3.6. Offers of cash gifts, gift vouchers or special discounts, which are not normally available to other employees, are not to be accepted. If a refusal of a gift is likely to offend the sender or jeopardise the business relationship, the employees is advised to inform the sender of UTCC's rule on gifts.
- 3.7. Employees are advised to politely refuse any gift that would be misinterpreted by others and report to their line manager any offer of gifts or favours refused and returned to the sender. The report should include:
 - The name of the organisational or individual.
 - The organisational or individual's relationship to UTCC.
 - Type of gift or favour.
 - The date the gift or favour was offered and returned.
- 3.8. Gifts offered to any work area in the UTCC would require approval before they can be accepted. The level of approval that would be required is as follows:

Value of gift (s)

Approval required

Up to £500	Head of Cost Centre. In the absence of this individual, the approval of the HRM/Business Manager or the Principal must be obtained.
Over £500	The Principal

- 3.9. Gifts of equipment to the UTCC must fulfil the health and safety requirements and therefore the approval of the Health and Safety officer would also be required before acceptance.
- 3.10. Employees may offer gifts to external contacts only with the approval of the HRM/Business Manager and Principal. Gifts should be appropriate and can be claimed for on an expenses claim form.

4. Hospitality

- 4.1. The provision of meals, drinks and hospitality generally for business related entertainment is permitted by UTCC on the condition that:
- The offer of hospitality is appropriate and proportionate to the business being transacted and is not seen, especially by the recipient as an improper inducement to influence a business related decision.
 - The cost will be reasonable. Where practicable, prior authorisation should be sought from the line manager, HRM/Business Manager or the Principal.
- 4.2. Where possible, guest should be entertained using the services provided by UTCC's preferred suppliers. If it is necessary to use external facilities, authorisation from the line manager must be obtained in advance.
- 4.3. Employees may also provide hospitality to other employees of the college during authorised activities, using the services provided by UTCC'S preferred suppliers. In this case, they will be required to obtain prior authorisation from their line manager.
- 4.4. Employees may accept reasonable and proportionate business related entertainment from external contacts provided the offer is not capable of influencing business decisions to the detriment of the UTCC.
- 4.5. Acceptance of hospitality while in attendance at relevant events or functions organised by external contacts can be accepted where it is clear that hospitality is corporate rather than personal.
- 4.6. If the employee believes that acceptance of hospitality is likely to be misconstrued, the offer should be refused.
- 4.7. It is also advisable not to accept offers of hospitality from the same individual or organisation on a frequent basis as this could be misinterpreted.

5. Record Keeping

- 5.1. A formal record of all gifts and hospitality received must be kept where:
- Any single gift or act of hospitality by any individual or group with a non-intrinsic value.
 - Any series of gifts or hospitality is accepted by an individual or group from the same third party and the cumulative total exceeds £100.00.
- 5.2. The Finance and Audit Committee and Governors will be kept informed by the Principal of any gifts or hospitality with a value exceeding £1000.00

6. Advice and Guidance

- 6.1. It is important that employees consider carefully, the circumstances in which they provide or accept gifts or hospitality in order to avoid any suspicion of improper behaviour. If an employee is in doubt as to whether the acceptance of a particular gift or hospitality may be in breach of this policy, they should seek advice from their line manager in the first instance.
- 6.2. In general, if the offer or acceptance of a gift or hospitality is such that you would be uncomfortable if knowledge of it became widely known, then it may be inappropriate.
- 6.3. Members of staff are advised to note that alleged breaches of this policy will be investigated under the relevant Disciplinary Procedure, and could also amount to an offence under the Bribery Act.