

POLICY / PROCEDURE TITLE		DATE OF APPROVAL
Gifts and Hospitality (including Conflicts of Interest)		July 2025
APPROVED BY	VERSION NO.	VALID UNTIL
Corporation Board	1	July 2028

OWNER	Director of Governance		
GROUP EXECUTIVE LEAD	Chief Executive Officer		
DOCUMENT TYPE	Policy <input checked="" type="checkbox"/> Group Procedure <input type="checkbox"/> Local Procedure <input type="checkbox"/>		
PURPOSE	<p>The purpose of this policy is to</p> <ul style="list-style-type: none"> Promote transparency and integrity in the acceptance of gifts and hospitality; Prevent any real or perceived conflicts of interest; Protect the reputation and ethical standards of NCG; Ensure compliance with legal and regulatory requirements, including the Bribery Act 2010. 		
APPLICABLE TO	<p>This policy applies to:</p> <ul style="list-style-type: none"> all NCG employees, as well as consultants, vendors, agency workers, contractors, service users, trainees/students, volunteers and/or any other parties who have a business relationship with NCG. All situations where NCG representatives are offered, receive, or give gifts and hospitality, or where personal interests could conflict with NCG duties. 		
EQUALITY ANALYSIS COMPLETED [POLICIES ONLY]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
	(If EA not applicable, please explain)		
KEY THINGS TO KNOW ABOUT THIS POLICY	<ol style="list-style-type: none"> Gifts with a value of less than £50 can be accepted and need not be declared. Any offer of a gift with a value greater than £50 can be accepted but must be approved and declared via the Gifts and Hospitality Declaration form – even if not accepted. Colleagues must exercise caution and consider whether the offer of a gift or hospitality is reasonable and proportionate and what the public perception might be. Colleagues also have a responsibility to identify and disclose actual, potential or perceived conflicts between their personal, family, financial or business interests and their professional responsibilities to NCG. 		

EXPECTED OUTCOME	Readers are expected to understand the organisational position on gifts, hospitality and conflicts of interest, know their responsibilities in relation to the policy and comply with the terms of the policy.
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MISCELLANEOUS	
LINKED DOCUMENTS	<ul style="list-style-type: none"> • Financial Regulations • Anti-Fraud Policy • Anti-Bribery and Corruption Policy • Anti-Money Laundering Policy • Whistleblowing and Disclosure Policy
KEYWORDS	<ul style="list-style-type: none"> • Gifts • Hospitality • Interests • Fraud • Bribery • Corruption

Equality Impact Assessment

EQUALITY IMPACT ASSESSMENT			
	Yes	No	Explanatory Note if required
EIA 1 - Does the proposed policy/procedure align with the intention of the NCG Mission and EDIB Intent Statement in Section 2?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	The answer to this must be YES
EIA 2 - Does the proposed policy/procedure in any way impact unfairly on any protected characteristics below?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
Age	<input type="checkbox"/>	<input checked="" type="checkbox"/>	The answer to this must be NO
Disability / Difficulty	<input type="checkbox"/>	<input checked="" type="checkbox"/>	The answer to this must be NO
Gender Reassignment	<input type="checkbox"/>	<input checked="" type="checkbox"/>	The answer to this must be NO
Marriage and Civil Partnership	<input type="checkbox"/>	<input checked="" type="checkbox"/>	The answer to this must be NO
Race	<input type="checkbox"/>	<input checked="" type="checkbox"/>	The answer to this must be NO
Religion or Belief	<input type="checkbox"/>	<input checked="" type="checkbox"/>	The answer to this must be NO
Sex	<input type="checkbox"/>	<input checked="" type="checkbox"/>	The answer to this must be NO
Sexual Orientation	<input type="checkbox"/>	<input checked="" type="checkbox"/>	The answer to this must be NO
EIA3 - Does the proposed policy/processes contain any language/terms/references/ phrasing that could cause offence to any specific groups of people or individuals?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	The answer to this must be NO
EIA4 - Does the policy/process discriminate or victimise any groups or individuals?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	The answer to this must be NO
EIA 5 - Does this policy/process positively discriminate against any group of people, or individuals?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	The answer to this must be NO
EIA 5 - Does this policy/process include any positive action to support underrepresented groups of people, or individuals?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	The answer to this could be yes or no as positive action is lawful. However, an explanation must be provided for clarity.
EIA 6 - How do you know that the above is correct?	This policy has been reviewed with members of the Policy Review Council and Audit & Risk Committee prior to Corporation approval.		

1. GENERAL POLICY STATEMENT

1.1 NCG is committed to:

- Upholding the highest standards of integrity, accountability, and professionalism;
 - Demonstrating exemplary standards of ethics and probity as an organisation in receipt of public funds.
 - Preventing improper influence in College operations, decisions, or relationships;
 - Maintaining public trust and confidence by ensuring transparency and fairness;
- This commitment underpins all aspects of NCG's approach to managing gifts, hospitality, and conflicts of interest.

1.2 The Gifts and Hospitality (including Conflicts of Interest) Policy is underpinned by the NCG Anti-Bribery and Corruption Policy and the two should be read in close conjunction.

1.3 NCG does not tolerate any accepting or giving of gifts or hospitality that contravenes the Bribery Act 2010.

2. DEFINITIONS

2.1. **Conflict of Interest** – when an individual's personal interests – financial, family, or other – conflict or could conflict with their duties and responsibilities to NCG.

2.2. **Family Member** – for the purposes of this policy, the term 'family member' should be given a wide meaning. It includes a partner (someone you are married to, your civil partner, or someone you live with, in a similar capacity), a parent, a parent-in-law, a son or daughter, a stepson or stepdaughter, the child of a partner, a brother or sister, a brother or sister of your partner, a grandparent, a grandchild, an uncle or aunt, a nephew or niece, and the partners of any of these people.

2.3. **Gift** - any item or benefit given or received without payment, including tangible items (e.g., goods, vouchers, tickets) and intangible benefits (e.g., discounts, services).

2.4. **Hospitality** - the provision or acceptance of meals, travel, accommodation, entertainment, or access to events, provided in a business or social context.

2.5. **Interest** - a financial, personal, or professional connection that may influence or appear to influence an individual's decisions or actions in the course of their duties.

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

3. GIFTS AND HOSPITALITY – BACKGROUND

- 3.1. Offering and receiving gifts and corporate hospitality is an accepted business practice aimed at building and strengthening working relationships. However, when such gifts or hospitality become increasingly lavish or excessive, a line can be crossed which takes the practice into the realm of bribery and corruption.
- 3.2. Under the provisions of the Bribery Act 2010, the inappropriate giving or receiving of gifts or hospitality may leave individuals open to charges of bribery.
- 3.3. Individuals must therefore exercise caution when considering whether to offer or accept gifts or hospitality.

4. RECEIVING GIFTS AND HOSPITALITY – GENERAL PRINCIPLES

- 4.1. Staff must not solicit gifts, hospitality or other benefits for personal gain.
- 4.2. All offers of low, medium and high value gifts or hospitality must be declared via the [Gifts and Hospitality declaration form](#) within 5 days.
- 4.3. The offer of a monetary gift of any value (or voucher equivalent) must be declined. However, you may suggest that the individual or organisation make a donation to a charity of your choice.
- 4.4. Any offers of gifts from suppliers offered during a procurement period must be declared and declined.
- 4.5. Colleagues are expected to apply their professional judgement when considering whether to accept gifts, in consideration of the conditions outlined in this policy. However, colleagues must be cautious about receiving gifts that could give grounds for accusations of impropriety or suggestions of undue influence. An offer of a gift or hospitality should only be accepted if you are satisfied that:
 - 4.5.1. the offer has been made for a proper purpose, and is associated with official NCG business;
 - 4.5.2. acceptance does not constitute an actual or perceived conflict of interest or perceived inducement in respect of a decision the individual or NCG is responsible for (including academic assessment);

4.5.3. the gift or hospitality has been given openly, and will be received and acknowledged openly, without any degree of secrecy attached;

4.5.4. the offer is appropriate and its value is reasonable and proportionate to the circumstances;

4.6. Ultimately, colleagues must consider whether receiving a gift is reasonable and proportionate and what the public perception in relation to the gift might be. If it could be perceived as excessive or disproportionate then the gift should be refused.

4.6.1. Categories of Gifts and Associated Requirement

Estimated Value	Example	Approval Required	Declaration Required	Retain or Decline
£50 or less	E.g. flowers, alcohol, confectionary, stationery etc.	No	No	Retain
£50-£100	E.g. flowers, champagne, expensive stationery, jewellery hampers, electronic equipment etc.	Yes	Yes	Retain
More than £100	E.g. expensive jewellery, electronic equipment, membership or subscription (e.g. sports or other clubs) where there would normally be a charge etc.	Yes	Yes	Decline
Monetary gift – any value	Cash or redeemable vouchers	Prohibited	Yes	Suggest Alternative

4.7. Staff may accept modest gifts from students or parents, provided they do not influence, or appear to influence, decisions relating to assessments or academic progress. Staff must always maintain fairness and integrity in all aspects of assessment. Any gift with a value exceeding £50 must be declared in line with table 4.6.1 above and staff should exercise caution and transparency in all such matters to ensure that no actual or perceived bias could arise.

4.8. Colleagues should also consider the cumulative nature of gifts when making declarations. For example, if over a 12-month period, you receive five items each worth £10, you should consider them as a single gift worth £50 and make an associated declaration.

- 4.9. In business, there are many instances of giving or receiving hospitality that are reasonable and proportionate, and made with the aim to build and strengthen working relationships. Normal, reasonable and proportionate hospitality given or received as part of NCG's wider student, commercial, promotional and marketing activities which is genuinely aimed at building a good business relationship or improving the profile of NCG is allowable, within certain limits. However, when assessing whether or not an offer of hospitality should be accepted, the following should be considered:

4.9.1. Categories of Hospitality and Associated Requirement

Type of Hospitality	Venue	Approval Required	Declaration Required
Drinks and snacks, working breakfast or lunch, formal lunch, drinks reception or similar networking event	Any third-party office or other venue (e.g. restaurant) away from third party's office	No	No
Evening Meal	Any venue	No	Yes
Expensive / Exclusive Hospitality *	Any venue	Yes	Yes

- 4.10. *This includes corporate hospitality at sporting or cultural events, tickets for sporting or cultural events, foreign or domestic travel and overnight stays which are not related to a specific business or academic activity etc. Accepting expensive or exclusive hospitality may be perceived negatively by the public and key stakeholders and therefore must be carefully considered before accepting.
- 4.11. Where approval is required as per the Tables at 4.6.1 and 4.8.1 this should be sought from the relevant principalship team or executive lead.
- 4.12. Where it is not possible to gain approval in advance, retrospective approval must be sought.

5. OFFERING GIFTS AND HOSPITALITY – GENERAL PRINCIPLES

- 5.1 The offer of a gift or hospitality by a colleague is only permitted when it is:
- To promote the values and reputation of NCG for academic, professional or charitable purposes;
 - to aid the establishment and maintenance of academic, collaborative, professional or business relationships with partners and supporters of NCG;

- to provide a small token of thanks to associates or supporters for their contribution to the work of the NCG.

5.2 Colleagues must again consider whether offering a gift or hospitality is reasonable and proportionate and what the public perception in relation to the gift or hospitality might be. If it could be perceived as excessive or disproportionate then the offer should not be made.

6. GIFTS AND HOSPITALITY REGISTER - RECORDING

- 6.1. The Gifts and Hospitality Register lists all declarations of gifts and hospitality received within the last 12 months.
- 6.2. Its purpose is to promote transparency in gifts and hospitality transactions. The Register serves to protect NCG staff from allegations of impropriety and may be used for reporting and disclosure purposes.
- 6.3. The Register is maintained by the Director of Governance. Should you have any queries in relation to the Register and / or how to make a declaration, please contact the Director of Governance (clerk@ncgrp.co.uk).
- 6.4. The Gifts and Hospitality Register shall be reported to the Audit & Risk Committee on an annual basis.

7. CONFLICTS OF INTEREST

- 7.1. All individuals involved in the business of NCG (governors, board and committee members, staff and contractors) have a duty to avoid conflicts of interest and a responsibility to identify and disclose actual, potential or perceived conflicts between their personal, family, financial or business interests and their professional responsibilities to NCG.
- 7.2. On an annual basis, NCG conducts a Declarations of Interest exercise.
- 7.3. The following individuals must complete an Annual Declaration of Interest:
 - Governors, Coopted Corporation Committee Members and Members of Local College Boards
 - All colleagues within a management position
 - All colleagues working in finance, payroll and procurement.

- 7.4. Declarations are gathered to form a Register of Interests which is then reported to the Audit & Risk Committee in support of the Annual Financial Statements.
- 7.5. In addition to the annual collection of Declarations of Interest, all colleagues must declare any potential conflict that arises during the year to the Director of Governance who will add it to the Register.
- 7.6. A Declaration of Interest must also be submitted for a family member where relevant.
- 7.7. Declared interests will be assessed and managed appropriately, which may include withdrawal from decision-making processes.
- 7.8. Declarations of interests are included as a standing item on the agenda of all meetings of the Corporation and its Committees and are managed in accordance with the process outlined in the Instrument of Government.
- 7.9. In the spirit of transparency and in accordance with best governance practices, the Register of Interest of members of the Corporation and Senior Post-Holders shall be made publicly available on the NCG website.

8. STATEMENT ON IMPLEMENTATION

- 8.1. Upon approval, this policy will be uploaded to the policy portal and communicated to staff via The Business Round-Up.

9. STATEMENT ON EQUALITY AND DIVERSITY

- 9.1. NCG is committed to providing equality of opportunity. Further details of our aims and objectives are outlined in our [Equality Diversity Inclusion and Belonging Strategy](#).

This policy has been assessed to identify any potential for adverse or positive impact on specific groups of people protected by the Equality Act 2010 and does not discriminate either directly or indirectly. In applying this policy, we have considered eliminating unlawful discrimination, promoting equality of opportunity and promoting good relations between people from diverse groups.

10. STATEMENT ON FREEDOM OF SPEECH

10.1. NCG is committed to upholding the principles of freedom of speech as enshrined in UK law. This policy is designed to ensure that all members of our college community, including students, staff, and visitors, can express their views and ideas freely and without fear of censorship or reprisal, provided that such expressions are within the law.

We affirm that this policy does not, in any way, diminish or undermine the rights of individuals under existing Freedom of Speech legislation.

11. STATEMENT ON CONSULTATION

11.1. This policy / procedure has been reviewed in consultation with members of the Policy Review Council and Audit & Risk Committee.

VERSION CONTROL				
Version No.	Documentation Section/Page No.	Description of Change and Rationale	Author/Reviewer	Date Revised
1	New policy – gifts and hospitality and conflicts of interest were previously included in the Anti-bribery and Corruption policy.	Director of Governance		Jun-2025