GIFTS, HOSPITALITY AND SPONSORSHIP POLICY

Author: Director of Finance and Procurement

Directorate responsible for this Document: Directorate of Finance & Procurement

Date: December 2015

Review Date: December 2017
## Policy Checklist

<table>
<thead>
<tr>
<th>Name of Policy:</th>
<th>Gifts, Hospitality &amp; Sponsorship Policy</th>
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| **Purpose of Policy:** | The purpose of this policy is to ensure that Trust employees are not placed in a position which raises or appears to raise, conflict in their progression of business activities. It aims to:  
- protect employees under the Bribery Act 2010 which makes it an offence to receive or offer a bribe (including certain levels of gifts and hospitality)  
- promote high standards in public life, ensuring that staff and Board members follow the key characteristics of propriety as defined in the Nolan Principles |
| Directorate responsible for Policy | Finance & Procurement Directorate |
| Name & Title of Author: | Mrs Vivienne Toal, Head of Employee Engagement & Relations |
| Does this meet criteria of a Policy? | Yes |
| Trade Union consultation? | Yes |
| Equality Screened by: | Mrs Vivienne Toal |
| Date Policy submitted to Policy Scrutiny Committee: | 14<sup>th</sup> December 2015 |
| **Members of Policy Scrutiny Committee in Attendance:** |  
- Kieran Donaghy Director of Human Resources & Organisational Development (Chair)  
- Stephen McNally Director of Finance & Procurement  
- Anita Carroll Assistant Director of Acute Services – Functional Support Services  
- Cecil Maguire Head of Specialist Estate Services  
- Melanie McClements Assistant Director of Older People’s Services |
| Policy Approved | 14<sup>th</sup> December 2015 |
| Policy Implementation Plan included? |  |
| Any other comments: |  |
| Date presented to SMT | 17<sup>th</sup> February 2016 |
| Director Responsible | Stephen McNally  
- Director of Finance & Procurement |
| SMT Approved | 17<sup>th</sup> February 2016 |
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Version: 1.0 |
|-------|--------------------------------------------------|
| Supersedes | Supersedes: Gifts, Hospitality & Standards of Business Conduct Policy  
Description of Amendments(s)/Previous Policy or Version:  
Following review of the above policy in December 2015, it has now been separated into 2 distinct policies:  
- Conflict of Interests Policy  
- Gifts, Hospitality and Sponsorship Policy |
| Originator | Name of Author:  
Vivienne Toal, Head of Employee Engagement & Relations |
| Scrutiny Committee & SMT approval | Referred for approval by: Mr Stephen McNally, Director of Finance  
Date of Referral:  
Scrutiny Policy Committee Approval: 14th December 2015  
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Responsibility of (Name): Mr Stephen McNally  
Title: Director of Finance & Procurement |
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1.0 INTRODUCTION

1.1 This policy is intended to provide advice to Trust staff who in the course of their day to day work or as a result of their employment, either receive offers of gifts, hospitality or sponsorship or provide gifts and hospitality to others on behalf of the Trust.

1.2 All decisions by Trust staff on the provision or acceptance of gifts and hospitality must be able to withstand both internal and external scrutiny. They must be defensible as being in the direct interest of the organisation, as being proportionate to that interest and within limits that are acceptable to the Trust Board.

1.3 This policy reflects the ‘Seven Principles of Public Life’ known as the Nolan Principles:

- Selflessness
- Integrity
- Objectivity
- Accountability
- Openness
- Honesty
- Leadership

Appendix 1 outlines further details of the above Nolan Principles.

1.4 The Bribery Act 2010, introduced new statutory offences for activities in the public or private sector including a new corporate offence. It also places specific responsibility on organisations to have in place sufficient and adequate procedures to prevent bribery and corruption taking place.

1.5 Under the Bribery Act 2010, it is an offence to:

- Pay bribes – to offer or give a financial or other advantage with the intention of inducing that person to perform a relevant function or activity improperly or to reward that person for doing so.
- Receive bribes – to receive a financial or other advantage intending that a relevant function or activity should be performed improperly as a result.
- ‘Relevant function or activity’ includes any function of a public nature and any activity connected with a business.
• Fail to prevent bribery – an organisation is guilty of an offence if Trust personnel or a third party connected to it bribes another person intending to obtain or retain business or a business advantage.

1.6 The prevention, detection and reporting of bribery and other forms of corruption are the responsibility of all those working for the Trust or under its control. The Trust expects all staff to perform their duties impartially, honestly, with integrity, and in good faith. All Trust staff are required to familiarise themselves and comply with the requirements of this Policy.

1.7 If a Trust employee is found to be in breach of the Gifts, Hospitality and Sponsorship Policy, he/she may be liable to disciplinary action under the Trust’s Disciplinary Procedure, which may result in dismissal for gross misconduct. The Trust also reserves the right to terminate its contractual relationship with third parties if they breach this policy.

1.8 In addition to any disciplinary process and where the breach amounts to a criminal offence, this will be referred to the Police Service of Northern Ireland (PSNI). Conviction under the Bribery Act is punishable by imprisonment for a maximum term of 10 years for individuals and unlimited fines can be imposed both to individuals and the Trust.

2.0 PURPOSE AND AIMS

2.1 The purpose of this policy is to ensure that Trust employees are not placed in a position which raises or appears to raise, conflict in their progression of business activities.

2.2 It aims to:

- protect employees under the Bribery Act 2010 which makes it an offence to receive or offer a bribe (including certain levels of gifts and hospitality)

- promote high standards in public life, ensuring that staff and Board members follow the key characteristics of propriety as defined in the Nolan Principles

3.0 POLICY STATEMENT

3.1 This policy has been compiled to ensure compliance with the 7 principles of Public Life drawn up by the Nolan Committee, contained in Appendix 1. All
Trust staff must therefore apply the following principles in the conduct of their employment:

- they must not accept gifts, hospitality, sponsorship or benefits of any kind from a third party which might be perceived as compromising their personal judgement or integrity;

- they must not make use of their official position to further their private interests or those of others;

- they must report any knowledge or evidence of impropriety to a line manager;

- they must refer to their Head of Service when faced with a situation for which there is no adequate guidance;

- if in any doubt, they must seek advice from the appropriate Head of Service/Assistant Director, the Director with line management responsibility or Director of Finance & Procurement.

4.0 SCOPE OF POLICY

4.1 This policy must be adhered to by each member of the Trust Board, all staff and volunteers.

5.0 RESPONSIBILITIES IN RELATION TO GIFTS, HOSPITALITY & SPONSORSHIP

5.1 Lead responsibility for policy monitoring and review lies with the Director of Finance and Procurement.

5.2 Operational responsibility for implementation of the policy lies with managers under the leadership of their relevant director.

5.3 The Board Assurance Manager is responsible for maintaining the Register of Gifts, Hospitality, Invitations & Sponsorships.
5.4 Acceptance of gifts

5.4.1 Cash or Cash Equivalents

Offers of cash or cash equivalents (e.g. lottery tickets, gift vouchers or gift cheques) made by suppliers, contractors, service users or their relatives to individual officers of the Trust should be declined. Instead, the supplier, contractor, service user or relative should be made aware of the range of Endowment and Gift (E&G) Funds which are managed by the Trust to receive cash donations for general or specific purposes. Details of the current E&G Funds are available from the Director of Finance and Procurement.

5.4.2 Non-Cash Gifts

Gifts of a small or inexpensive nature such as calendars or diaries or other simple or inexpensive items such as flowers and chocolates which have a value less than £50 can be accepted. This type of gift can be easily distinguishable from more expensive or substantial items which cannot on any account be accepted. If there is any doubt as to whether the acceptance of such an item is appropriate, the matter should be referred to the Trust’s Director of Finance and Procurement.

5.4.3 Bequests

Gifts, whether cash or non-cash, bequeathed to individual officers of the Trust through the provisions of a will, must also be declined.

5.4.4 Exceptional Cases

It is recognised that there are exceptional cases where refusal of a gift will clearly offend a donor, cause embarrassment or appear discourteous. In these cases the donor should be advised that the permission of Trust Management will have to be sought as to whether or not the gift can be accepted. The appropriate form should be completed (Appendix 5) and the Trust’s Director of Finance and Procurement should be asked to decide whether to:

- allow the recipient to accept the gift; or
• return the gift to the donor with a suitably worded letter explaining why the gift cannot be accepted. A template is attached at Appendix 4 which should be tailored to each individual circumstance; or

• use or dispose of it, if possible, in or by the Trust, or

• donate the gift to a nominated charity

5.4.5 Lectures, Conferences and Broadcasts

Where gifts by the way of fees, ex gratia payments or book tokens for lectures, broadcasts or similar occurrences are offered, their acceptance should be based on how much of the preparatory work for the event was done in the employee’s own time, how much in official working time and the extent to which the Trust resources, other than for example, use of an officially issued laptop at home, were used in the preparation. The guiding principle is that the Trust will seek to recover the costs of publicly funded resources used for any non-HSC events. The following illustrations are by way of example:

- if the preparation was carried out entirely in the individual’s own time (for example outside fixed sessional commitments for medical or other clinical staff) and the event took place in the employee’s own time at no expense to the Trust, it would be acceptable for the individual officer to retain the whole fee, token or other gift;

- if the preparation was performed wholly on Trust time, with the use of Trust resources, the Director of Finance and Procurement or his nominated representative, should be consulted to determine the need to charge the organisation or body a fee based on the salary costs of the individual and/or the use of resources. If the event is carried out in the employee’s own time then in addition to any charge for the use of Trust resources, the individual officer may retain any fee, token or other gift for presenting at the event up to a value of £50.

- if the preparation was carried out and the presentation, delivered in the officer’s own time but Trust facilities or equipment were used, then the Director of Finance and Procurement should be consulted to determine the need to charge the organisation or body a fee based on the use of resources. In addition to any charge for use of any Trust resources, the individual officer may retain any fee, token or other gift for presenting at the event up to a value of not more than £75.
If further guidance is needed in this area, the Director of Finance & Procurement should be consulted.

5.4.6 **Trade or Discount Cards**

Trade or discount cards, other than those negotiated by the Trust on behalf of its staff, by which an officer might benefit from the purchase of goods or services at a reduced price are classified as gifts and should be politely declined and, if already accepted, returned to the sender.

Frequent Flyer cards used by airlines can be used by staff to avail of special departure lounges and priority booking and check-in. Staff must not make private use of any flights/air miles, which derive from flights paid for from the public purse.

5.4.7 **Staff involved in the procurement or monitoring of a contract**

Apart from trivial/inexpensive gifts as referred to in section 6.2, no gifts or hospitality of ANY kind from any source should be accepted by anyone involved in the procurement or monitoring of a contract. This will ensure that no criticism can be made regarding bias to a particular company or supplier.

5.4.8 **Hospitality received from third parties**

The handling of offers of hospitality is recognised as being much more difficult to regulate but it is an area in which staff must exercise careful judgment. It is recognised that it can be as embarrassing to refuse hospitality as it can be to refuse a gift. There is also a need to distinguish between simple, low cost hospitality of a conventional type, for example, a working lunch or evening meal compared with more expensive and elaborate hospitality. There is clearly a need for a sense of balance. There is concern that acceptance of frequent, regular or annual invitations to events or functions, particularly from the same source and where a considerable degree of hospitality is involved, may severely test the principles stated earlier and should be refused. However, there may be instances where staff receive invitations to events run by voluntary organisations such as annual conferences or dinners. Attendance at such events is considered an integral element in building and maintaining relationships with these sectors and any hospitality received is likely to be reasonable and proportionate, and therefore acceptable.
The main point is that in accepting hospitality staff need to be aware of, and guard against, the dangers of misrepresentation or perception of favouritism by a competitor of the host. It is obviously easier to justify meetings which relate directly to the work of the Trust but where these happen outside working hours and on purely social occasions then they need to be justified as not being a personal gift or benefit. Where a contract is being negotiated, hospitality of any kind, including attendance of staff at seasonal events hosted by suppliers or contractors, should not be accepted.

As a general rule, invitations of hospitality which are extended to the Trust as a whole, can be accepted by a nominated officer and are less likely to attract criticism than personalised invitations to individual officers.

When in doubt about accepting hospitality or an invitation you should consult your Head of Service or the Director of Finance and Procurement. In all instances where anything beyond conventional hospitality is offered, the approval of the Head of Service or the Director of Finance and Procurement should be sought using the template at Appendix 5. It is particularly important to ensure that the Trust is not over represented at an event or function and care should be taken to ensure that this does not happen, for example, by enquiring from the host as to other staff who have received similar invitations.

5.4.9 Awards or Prizes

Staff should consult their Head of Service or the Director of Finance and Procurement if they are offered an award or prize in connection with their official duties. They will normally be allowed to keep it provided:

- there is no risk of public criticism;
- it is offered strictly in accordance with personal achievement;
- it is not in the nature of a gift nor can be construed as a gift, inducement of payment for publication or invention to which other rules apply.

5.4.10 Sponsorship for Attendance at Courses and Conferences

All offers of financial assistance or sponsorship by commercial or other organisations to attend courses or conferences, involving an overall value in excess of £50, must be directed to the appropriate Director. The Director may accept such offers on behalf of the Trust provided that:

- the course or conference is one that the Trust would otherwise support
- the travel, accommodation and subsistence arrangements are in line with Trust guidance

SHSCT – Gifts & Hospitality and Standards of Business Conduct Policy
- the sponsoring body does not nominate any particular individual (the Director will determine attendance in line with normal procedure)
- the sponsorship is not from a source that may be perceived to be in conflict with HSC aims and objectives, for example, from tobacco companies.

5.4.11 Provision of Hospitality, Gifts and Awards

The paragraphs below outline the responsibilities on staff when considering the provision of hospitality, gifts or awards. Appendix 2 sets out maximum expenditure limits that have been prescribed by the Trust Board for such occurrences. The provision of hospitality, gifts and awards and/or the expenditure limits set out in Appendix 2 may be amended at any time in light of financial or other considerations. Such amendments will be issued by the Chief Executive’s Office and will remain in force until formally further amended. If in doubt, the Director of Finance and Procurement should be consulted before any expenditure is committed.

a) Internal Hospitality

This should only be considered in clearly defined circumstances. For example, where meetings outside of normal working hours cannot be avoided (early morning or after normal working hours) or where staff are required to travel to attend meetings in circumstances where a lunch time break is not possible.

Where hospitality is to be extended for internal meetings, it should be limited to light refreshments and subject to the maximum limit set out in Appendix 2. In such cases written approval should be sought in advance from the appropriate Head of Service using the request form available from Facilities Managers in each locality.

In relation to residential training courses/conferences it is normal practice for meals and light refreshments to be provided for delegates. The provision of beverages, including alcohol, is permitted with evening meals, at the discretion of the relevant Head of Service. However any alcohol provision should be modest in nature and in no circumstances exceed one third of the cost of the evening meal.

In relation to non-residential events, lunch may be provided where it facilitates the running of the course or where alternative provision is not available. Written approval should be sought in advance from the
appropriate Head of Service. Beverages provided with lunches should be restricted to tea, coffee, water or fruit juice.

As a policy rule, the Trust does not sponsor, or take up invitations to sponsor tables at charitable or other events organised by external bodies.

b) External Hospitality

The provision of hospitality by the Trust to representatives of other organisations should be modest and appropriate to the circumstances. In all instances, the expenditure involved must constitute good value for money.

Hospitality should not be offered solely as a return gesture or be automatically recurrent on a regular basis unless circumstances indicate that it is appropriate to do so. The use of public monies for hospitality purposes at conferences and seminars should be carefully considered. The Trust needs to be able to demonstrate good value in committing public funds.

5.4.12 Other Circumstances

If situations arise that are not covered by the foregoing guidance, prior approval should be sought from the Chief Executive or Director of Finance and Procurement before hospitality is provided and such approval should be formally documented.

It is recognised that there may be cases when, in the interests of the service, flexibility in interpretation of the rules may be necessary. Prior approval for such situations should be obtained in writing from the Chief Executive. Any request for approval of such instances should state why the request falls outside the boundaries of what is normally allowable and why it is considered necessary to provide such hospitality.

5.5 AUTHORISATION AND APPROVAL OF HOSPITALITY

The purchase of gifts and hospitality should follow the Trust’s normal procurement procedures and should comply with the requirements of mini-code.

Notwithstanding those circumstances indicated above where specific approval is required from the Chief Executive or Director of Finance and

SHSCT – Gifts & Hospitality and Standards of Business Conduct Policy

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Procurement, authorisation for, and approval of, hospitality expenditure should be obtained in accordance with the Trust's Schedule of Delegated Authority and associated procedures.

5.6 PROVISION OF GIFTS OR AWARDS

Occasionally the Trust may wish to make a small presentation to speakers or other volunteers in acknowledgement of services provided to the Trust. Such gifts or awards should be of a token nature. Prior approval for the provision of gifts or awards is required from the appropriate Head of Service and such approval should be formally documented.

5.7 REGISTER OF GIFTS, HOSPITALITY, SPONSORSHIP AND INVITATIONS

A Register of Gifts, Hospitality, Sponsorship and Invitations is maintained by the Board Assurance Manager in the Office of the Chair & Chief Executive. All offers of gifts, awards, sponsorship, prizes, invitations and substantial hospitality made to any member of the Trust Board or Trust staff over the value of £50 must be reported by each manager using the form included in Appendix X. Details should include: where the offer originated, to whom it was made, the amount and a note of the action taken, i.e. accepted/refused/returned. It is the responsibility of the individual member/ officer to forward these details to the Board Assurance Manager.

The Register will be published on the Trust’s website. All offers of gifts, hospitality and sponsorship should be recorded and a record maintained by the Director. Only details of offers above £50, accepted or otherwise, should be forwarded to the Board Assurance Manager.

5.8 RECORDING OF HOSPITALITY PROVIDED BY THE TRUST

All internal and external expenditure on hospitality should be allocated specific financial coding to assist in the collation of management information and to facilitate the monitoring and control of this facility.

6.0 EQUALITY AND HUMAN RIGHTS CONSIDERATIONS

This policy has been screened for equality implications as required by Section 75 and Schedule 9 of the Northern Ireland Act 1998. Equality Commission guidance states that the purpose of screening is to identify those policies which are likely to have a significant impact on equality of opportunity so that greatest resources can be devoted to these.
Using the Equality Commission’s screening criteria, no significant equality implications have been identified. The policy will therefore not be subject to an equality impact assessment.

Similarly, this policy has been considered under the terms of the Human Rights Act 1998, and was deemed compatible with the European Convention Rights contained in the Act.

7.0 ALTERNATIVE FORMATS

This is document can be made available on request in alternative formats, e.g. plain English, Braille, disc, audiocassette and in other languages to meet the needs of those who are not fluent in English.

8.0 RECORDS MANAGEMENT

The supply of information under the Freedom of Information does not give the recipient or organisation that receives it the automatic right to re-use it in any way that would infringe copyright. This includes, for example, making multiple copies, publishing and issuing copies to the public. Permission to re-use the information must be obtained in advance from the Trust.

9.0 SOURCES OF ADVICE AND FURTHER INFORMATION

Line-managers should be contacted in the first instance, in relation to any specific queries on the content of this policy. Managers / Heads of Service / Assistant Directors should then escalate queries which they are unable to address to their Director. Further advice for Directors is available from the Director of Human Resources & Organisational Development.
THE SEVEN PRINCIPLES OF PUBLIC LIFE

Selflessness - Holders of public office should take decisions solely in terms of the public interest. They should not do so in order to gain financial or other material benefits for themselves, their family or their friends.

Integrity - Holders of public office should not place themselves under any financial obligation to outside individuals or organisations that might influence them in the performance of their official duties.

Objectivity - In carrying out public business, including making public appointments, awarding contracts, or recommending individuals for rewards and benefits, holders of public office should make choices on merit.

Accountability - Holders of public office are accountable for their decisions and actions to the public and must submit themselves to whatever scrutiny is appropriate to their office.

Openness - Holders of public office should be as open as possible about all the decisions and actions that they take. They should give reasons for their decisions and restrict information only when the wider public interest clearly demands.

Honesty - Holders of public office have a duty to declare any private interests relating to their public duties and take steps to resolve any conflicts arising in a way that protects the public interest.

Leadership - Holders of public office should promote and support these principles by leadership and example.
APPENDIX 2

PRESCRIBED MAXIMUM EXPENDITURE LIMITS FOR THE PROVISION OF HOSPITALITY.

1. **Hospitality for Internal Meetings:**
   Maximum Limit: £5 per head.

2. **Residential or Non-Residential Events Organised by the Trust:**
   - Lunch - £10 per delegate
   - Evening Meal - £20 per delegate
   - Beverages supplied with meals - one third of cost of meal.

3. **Extension of Hospitality to Individuals External to the Trust:**
   - Lunch - £20 per Head
   - Evening Meal - £30 per Head
   - Beverages - one third of cost of meal

4. **Provision of Nominal Gifts to Guest Speakers, Volunteers etc:**
   Small gifts or gift tokens may be provided to a maximum value of £50.
APPENDIX 3

NOTIFICATION OF OFFERS OF GIFTS /HOSPITALITY/AWARDS / SPONSORSHIP OVER £50 IN VALUE

DIRECTORATE:  

<table>
<thead>
<tr>
<th>Date of event/ gift offered</th>
<th>Offered to</th>
<th>Offered from</th>
<th>Description of offer and reason</th>
<th>Details of contracts – current or potential</th>
<th>Est value of offer (£)</th>
<th>Action taken (Accepted/refused/returned)</th>
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This proforma must be completed monthly and forwarded to Sandra Judt, Sandra.Judt@southerntrust.hscni.net in the Chair and & Chief Executive’s office to update the Trust wide Gifts and Hospitality Register
Contact name
Contact details etc

Date

Dear

The Southern Health and Social Care Trust operates a Gift, Hospitality & Sponsorship Policy to ensure high standards of propriety in the conduct of its business.

On account of public confidence, perception is as important as reality and because of this I am obliged to return your offer of..........................

This is not meant in any way to offend or imply that your [gift/hospitality] was offered in anything but the utmost of good faith, but is designed to protect both individual members of staff and the Southern Health and Social Care Trust. I hope you will accept our response in that spirit and that we can look forward to continued effective working relationships.

Yours ...............
## GIFT/HOSPITALITY APPROVAL FORM

### APPENDIX 5

**PART 1** – To be completed by recipient of gift/hospitality

<table>
<thead>
<tr>
<th>GIFT/HOSPITALITY AUTHORISATION FORM</th>
</tr>
</thead>
<tbody>
<tr>
<td>Name of person to whom offer made:</td>
</tr>
<tr>
<td>Date of event or gift offered:</td>
</tr>
<tr>
<td>Name of originator of offer:</td>
</tr>
<tr>
<td>Description of offer and reason:</td>
</tr>
<tr>
<td>Estimated/actual value of offer:</td>
</tr>
<tr>
<td>State whether the offer was declined:</td>
</tr>
<tr>
<td>Is there a current/potential contract with the donor? If yes, provide details:</td>
</tr>
<tr>
<td>Signature of recipient:</td>
</tr>
<tr>
<td>Signed: Date:</td>
</tr>
</tbody>
</table>

**PART 2** – To be completed by Director of Finance & Procurement/Head of Service

<table>
<thead>
<tr>
<th>GIFT/HOSPITALITY AUTHORISATION FORM (OUTCOME)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Decision: (Approved/Not Approved)</td>
</tr>
<tr>
<td>Reason why approval has/has not been granted:</td>
</tr>
<tr>
<td>Is gift being returned? (If so, letter as per Appendix 4 should be used)</td>
</tr>
<tr>
<td>Has the gift been used or disposed of? If so, give details:</td>
</tr>
<tr>
<td>Has the gift been donated to a nominated charity?</td>
</tr>
<tr>
<td>Has the Gifts and Hospitality register been updated?</td>
</tr>
<tr>
<td>Signature of Director of Finance &amp; Procurement/Head of Service:</td>
</tr>
<tr>
<td>Signed: Date:</td>
</tr>
</tbody>
</table>