



POLICY ON THE ACCEPTANCE AND PROVISION OF GIFTS AND HOSPITALITY

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This policy is a controlled document and is held centrally by the Director of Finance and Corporate Services.

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1. INTRODUCTION

- 1.1 This policy is intended to provide advice to individuals who, in the course of their day-to-day work or as a result of their employment, either receive offers of gifts, tickets and hospitality or provide gifts, tickets and hospitality to others on behalf of the Arts Council of Northern Ireland.
- 1.2 An integral part of the business is that specialist art form officers and Directors and, as part of their role, are encouraged to attend events to monitor and assess the artistic performance of organisations and individual artists.
- 1.3 All decisions by individuals on the provision or acceptance of gifts, tickets 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 Board.
- 1.4 Individuals must at all times:
 - Observe the highest standard of impartiality, integrity and objectivity in relation to stewardship of public funds.
 - Comply with all reasonable requests for information from the Assembly, Parliament, users of services, individual citizens and the media, where appropriate.
 - Ensure maximum value for money through ensuring that services are delivered in the most efficient and economical way, within available resources.

2. OPENNESS AND RESPONSIVENESS

- 2.1 The Arts Council is responsible for providing all its stakeholders including the public, with as full information as may be requested concerning its policy decisions and actions. Individuals should ensure that they can demonstrate that they are using resources to good effect with probity, and that public funds are not being used for private partisan or party political purposes. They should conduct all dealings with the public in an open and responsible way, ensuring full compliance with the requirements of the Freedom of Information and Data Protection Acts.

2.2 Key Points

- (a) As a general rule all gifts should be refused. However modest or promotional gifts may be accepted (see Section 3, paragraph 3.1)
- (b) You must seek approval to receive a gift (including tickets and events) over £50 and Hospitality totalling over £30 (see Section 3 and Appendix 1).
- (c) If you are providing a gift on behalf of ACNI, you must seek proper approval (see Section 4 and Appendix 3).
- (d) All hospitality provided by ACNI must have proper approval (see Section 4 and Appendix 4).
- (e) Recording: as a general rule you must record all gifts accepted (including tickets and events received) and Hospitality (see Section 5 and Appendix 2). Promotional gifts and modest meals do not need to be recorded (per table 1b & 1e).
- (f) Declined gifts and tickets over £50 and hospitality over £30 should be recorded (see paragraph 5.1). A template letter that may be used when declining gifts is attached at Appendix 6.

3. ACCEPTANCE OF GIFTS, TICKETS AND HOSPITALITY

- 3.1 In accepting gifts, tickets and hospitality individuals should conduct themselves with honesty and impartiality in the exercise of their duties and, as a consequence, they should not receive benefits of any kind from a third party (either directly or indirectly) which might reasonably be seen to compromise their personal judgement, impartiality, integrity or which might bring ACNI into disrepute.
- 3.2 In addition it should be noted that this policy should also be seen as applying to spouses, partners or other associates if it can be argued or perceived that a gift or offer of hospitality is in fact for the benefit of the individual. Registers of gifts and hospitality must be maintained, updated and monitored in respect of all events, gifts, tickets and hospitality made to individuals.

Table 1A: Approvals Process

Recipient	Approving Officer	If Approving Officer not available
Staff	The relevant Line Manager	Relevant Director/ Chief Executive
Chief Executive	Chairman of Board	Director of Finance and Corporate Services
Advisors under contract with ACNI	Chief Executive	Relevant Director
Board members of ACNI or	Chairman of Board	Chief Executive or Director of F&CS
Co-opted Committee members	Chairman of Board	Chief Executive or Director of F&CS

Chairman of Board	Chief Executive	Director of Finance and Corporate Services
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3.3 Acceptance of Gifts

The general principle is that all gifts offered should be refused. However, modest seasonal or promotional gifts (e.g. calendars, diaries, pens, IT software/accessories etc.) which bear Company names and/or logos of the provider of the gift and have a value of less than £50 may be accepted by individuals without the need for these to be approved in advance. Acceptance of non promotional gifts totalling under £50 is subject to the prior approval by management (see Section 3 and Appendix 1).

3.3.1 More expensive or substantial items valued at £50 or more and gifts of cash, gift vouchers or gift cheques **should be declined** unless they directly relate to the business of The Arts Council. In this case appropriate approval should be sought (see Table 1A Approval process above).

3.3.2 Gifts of lottery tickets, alcohol, cigarettes or cigars **should be declined in all circumstances** and should, where appropriate be returned to the donor with a suitably worded letter. With the exception of seasonal, promotional or trivial items, all gifts accepted must be recorded in the approval form (Appendix 1).

3.3.3 Corporate trade, loyalty or discount cards, through which an individual might personally benefit from the purchase of goods or services at reduced prices, are classified as gifts and should be refused or returned to sender. The personal use of such cards is not permitted. If any offer, gift or irregular suggestion is made to an individual either in connection with an application for funding or with the objective of obtaining preferential treatment the facts must be reported immediately to the Chief Executive or the Chairman as appropriate (see Table 1A , Table 1C and Appendix 1).

It is the responsibility of the individual to record appropriate gifts in the appropriate Register of Events, Gifts and Hospitality (see Section 5).

Table 1B: Gifts

Value	Gift	Approval	Recording
Under £50	Promotional	Not required	Not required
Under £50	Non promotional	Required	Required
Over £50	Promotional or not	Required	Required

3.4 **Acceptance of Tickets (Events)** Individuals should at no time actually seek to acquire complimentary tickets for arts events subsidised by the Arts Council.

- 3.4.1 However there will be instances where individuals receive invitations or are required to attend arts events such as client performances, annual conferences or dinners. Attendance at such events is considered an integral element in building, supporting and maintaining relationships with clients as well as assessing artistic quality.
- 3.4.2 It will be for the recipient/approving officer to demonstrate that acceptance was in the interest of ACNI.
- 3.4.3 Should such tickets/gifts have a total value of £50 or more individuals must seek appropriate approval¹ as per the approvals process (see Table 1A and Appendix 1).

It is the responsibility of the individual to record such offers of tickets in the appropriate Register of Events, Gifts and Hospitality (see Section 5).

Table 1C: Tickets (Individuals excluding Board Members)

Value/Item	Approval	Recording
Ticket £0	Not Required	Not Required
Tickets up to £50	Not required	Required
Accepting Tickets £50 and over	Required	Required
Declining Tickets £50 and over	Not Required	Required

- 3.4.4 Board members: Pre-approval for Board members' attendance at **client funded events** will be through a listing of client events, issued by the Chief Executive's Office and compiled from the recommendations of the arts officers.

In addition, pre-approval for one-off invitations from client organisations will be initiated through the Chief Executive's Office and notified to Board members as appropriate.

For **events not on the pre-approved list** prior approval of the Chairman or the Chief Executive must be sought.

¹ **1 For Board approval see para 3.4.4**

Table 1D: Tickets (Board Members only)

Value/Item	Approval	Recording
Tickets pre-approved on a listing of clients events presented to the Board	Not required	Required
For Tickets not on the pre-approval listing with a monetary value of zero	Not required	Not Required
For events not on the pre-approval listing with a ticket monetary value or you intend to claim other associated costs such as mileage	Required	Required
Declined Tickets over £50	Not Required	Required

3.5 **Acceptance of Hospitality** Hospitality includes the provision of meals and invitations to functions to entertainment, sporting and other venues.

3.5.1 The handling of offers of hospitality requires individuals to exercise careful judgement. The basic principle must be that, where there is any risk that the acceptance of an offer of hospitality could be construed as influencing an individual in the exercise of his/her official duties, it must be refused. Some circumstances where acceptance of hospitality may be regarded as appropriate and reasonable are listed below.

- Modest working lunches (such as soup/sandwiches or bar snacks) where the value of the hospitality offered does not exceed £15 per head.
- You can accept modest lunches over £15 but under £30, and you must record these.
- Hospitality received in association with an official meeting attended by an individual in his/her official capacity.
- Hospitality received at functions where an individual is attending in a clearly representational capacity as, for example, at official conferences, attendance at events, the official opening of facilities or the launch of initiatives.

Table 1E Accepting Hospitality

Value/item	Approval	Recording
Modest meal accepted below £15	Not Required	Not Required
Modest meal accepted above £15 up to £30	Not Required	Required
Meal provided by clients which is above the value of £30	Required	Required

- 3.5.2 Subject to the exceptions listed above, no offer of hospitality should be accepted without **prior** approval (see Table 1A).
- 3.5.3 If an offer of hospitality, which requires prior approval, is made without advance notice as, for example, during an outside visit, it should be declined unless there are circumstances to justify its acceptance. Any such instance must be reported to the appropriate approving officer (see Table 1A).

It is the responsibility of the individual to record such offers of hospitality in the appropriate Register of Gifts, Tickets (Events) and Hospitality (see Section 5).

4. PROVISION OF GIFTS AND HOSPITALITY

- 4.1 **Provision of Gifts (Appendix 3)** ACNI is authorised to give a gift up to a limit of £100. This is subject to a Director's approval and completion of the appropriate form (see Appendix 3). The Chief Executive and Directors are not required to complete this form for minor merchandising (for merchandising items such as umbrellas, key rings etc up to a value of £30). The Chairman will discuss in advance with the Chief Executive the provision of merchandising by the Board.
- 4.2 **Provision of Hospitality (Appendix 4)** With regard to hospitality provided by individuals, it must be remembered that the cost of such hospitality is met directly from the Arts Council's budgets and prior approval must be sought for all hospitality (Appendix 4). A fundamental consideration governing the justification for extending hospitality at public expense is that on every occasion it must be in the direct support of the Arts Council's business. Official entertainment should be, and should be seen to be, unostentatious and on a modest scale. It should not provoke public comment about 'wining and dining' at the taxpayers' expense, or about public servants benefiting from arrangements which exist primarily for the purpose of extending hospitality to others.

Table 1F Provision of Gifts and Hospitality

Value	Approval	Approval Process
Minor merchandising	Not required	n/a
Gifts up to £100	Required	Appendix 3
Hospitality	Required	Appendix 4

- 4.2.1 Applications to extend official hospitality must be made in good time and in writing to the Chairman for the Board, Chief Executive for Directors or, the relevant Director for staff, giving details of the function, purpose, guests, venue, cost etc. Claims for reimbursement of such hospitality should be supported by vouching documentation, should list the names of everyone hosted and should give the reason for the hospitality.
- 4.2.2 Hospitality must not be ordered without formal approval (Appendix 4) and should be accompanied by a purchase order number. In exceptional circumstances staff may incur minor hospitality and seek reimbursement through their expenses. The approving officer must scrutinise and critically challenge such expenditure and if satisfied that expenditure is legitimate, their approval on the staff expenses form will be deemed to also be an approval for incurring the expenditure.
- 4.2.3 Hospitality offered during training courses, events, board meetings, conferences and workshops should be at the appropriate level. The scale of the hospitality should be appropriate to the needs of the occasion and the guests (see also para 4.2.6). Any meals should be on a modest scale, with the total cost per head not exceeding £30. The element for refreshments must not exceed one third of the total bill.
- 4.2.4 When hosting a meeting to which guests are invited, lunchtime should be avoided. Lunch on a modest scale, should only be offered if a meeting runs both sides of lunchtime. This requires advance approval.
- 4.2.5 Hospitality should not be provided for internal meetings attended only by ACNI staff. However senior management, in the interests of good management, may offer non alcoholic beverages or coffee and a modest lunch to employees working through lunch breaks, participating in sessions over lunch or beyond normal working hours or during staff development or other appropriate work related activities.
- 4.2.6 The following criteria should be used to judge the appropriateness and scale of official entertainment:
- When considering the entertainment of specific visitors, regard should be had to keeping as low as possible the number of public sector participants (some of whom may be in receipt of subsistence

allowances) at such functions; expenditure would be more difficult to defend if incurred on behalf of visitors who are being paid from public funds for their services. The Arts Council should not normally bear the costs of hospitality including working meals for officials or public servants except where officials form a minor and necessary part of the total guests.

- The same guests should not normally be offered hospitality on an automatically recurrent or regular basis, or solely as a gesture of reciprocity.
- The official entertainment of one individual by another individual should be only on the strictest interpretation of the above criteria.
- When choosing venues for meals the Arts Council should avoid the more expensive and luxurious hotels and restaurants. When practicable, functions should take the form of lunch rather than dinner and hospitality should be kept to a minimum e.g. sandwiches.
- Where entertainment involves a meal in a hotel, a set menu for food and drink at a fixed price should normally be settled in advance with the management and the a la carte choice avoided.
- Where the entertainment takes the form of a sit down meal the cost of drinks should not normally exceed one third of the cost of the function and any meals should be on a modest scale with the total per head not exceeding £30.

5. RECORDING OF GIFTS, TICKETS (EVENTS) AND HOSPITALITY

Recording should be in accordance with the following tables:-

Table 1B: Gifts

Value	Gift	Approval	Recording
Under £50	Promotional	Not required	Not required
Under £50	Non promotional	Required	Required
Over £50	Promotional or not	Required	Required

Table 1C: Tickets (Individuals excluding Board Members)

Value/Item	Approval	Recording
Ticket £0	Not Required	Not Required
Tickets up to £50	Not required	Required
Accepting Tickets £50 and over	Required	Required
Declining Tickets £50 and over	Not Required	Required

Table 1E Accepting Hospitality

Value/item	Approval	Recording
Modest meal accepted below £15	Not Required	Not Required
Modest meal accepted above £15 up to £30	Not Required	Required
Meal provided by clients which is above the value of £30	Required	Required

5.1 Monitoring of Events, Gifts and Hospitality All Arts events attended by individuals where they are representing the Arts Council (whether complimentary or not) should be recorded in the on-line Register of Events, Gifts and Hospitality.

Declined gifts and tickets over £50 and hospitality over £30 should be recorded.

It is the responsibility of the individual to record accepted offers in the appropriate Register of Events, Gifts and Hospitality (see Appendix 5).

- (a) **Board Members/Co-opted Committee members** Board members should complete an events, gifts and hospitality form and return to the Executive Assistant to the Board on a monthly basis for inclusion in the online register.
- (b) **Advisors under contract with ACNI** Advisors should complete an events, gifts and hospitality form and return to the PA to the Chief Executive as appropriate for inclusion in the online register. The Chairman and the Chief Executive will be responsible for monitoring this register on an annual basis.
- (c) **Staff** All ACNI staff must complete an on-line events, gifts and hospitality register on a monthly basis. This provides details of all offers of hospitality (whether accepted or declined).

- (d) **Staff involved in procurement or monitoring of contracts** Apart from trivial/promotional seasonal gifts (e.g. diaries), no gifts of any kind from any source should be accepted by anyone involved in the commissioning, procurement, monitoring or management (including payment authorisation) of a contract. This is designed to avoid criticism being made regarding bias to a particular company or supplier.

Signed on behalf of organisation:

Name: _____ Date: _____

Signed on behalf of NIPSA:

Name: _____ Date: _____

Appendix 1

**Approval Form for Acceptance of Gifts or Events (Tickets)
Accepted by ACNI Individuals
(Approvals are required per Tables 1A, 1B and 1C)**

1 Name of Proposed Recipient(s)

2 Detail of Ticket or Event Accepted

.....

(Give a brief description)

3 Estimated Value

4 Name and Address of Offerer

5 Date of Offer

6 Purpose of Offer

7 Is there a current/potential contract with donor? (give details)

8 Comments (where appropriate)

9 Statement by Approving Officer detailing why approval has or has not been granted

10 Has the Events, Gifts and Hospitality Register been updated? YES / NO

11 Signature of Recipient Date

12 Signature of Approving Officer Date

Please ensure that the Events, Gifts and Hospitality Register has been updated as appropriate.

Completed and signed form to be returned to the PA to the Chief Executive

Appendix 2

Approval Form for Acceptance of Hospitality Accepted by ACNI Individuals (Approvals are required per Table 1E)

1 Name of Proposed Recipient(s)

2 Detail of Hospitality Accepted

.....

(Give a brief description)

3 Estimated Value

4 Name and Address of Offerer

5 Date of Offer

6 Purpose of Offer

7 Is there a current/potential contract
with donor? (give details)

8 Comments (where appropriate)

--

9 Statement by Approving Officer detailing
why approval has or has not been granted

10 Has the Events, Gifts and Hospitality Register been updated? YES / NO

11 Signature of Recipient Date

12 Signature of Approving Officer Date

**Please ensure that the Events, Gifts and Hospitality Register has
been updated as appropriate.**

Completed and signed form to be returned to the PA to the Chief Executive

Appendix 3

Approval Form for Provision of ACNI Gift

Name and Address of proposed recipient(s)

.....
.....
.....

Please provide details of the Gift

.....
.....
.....

Estimated Value (including VAT)

Please give reason for Gift

.....
.....
.....

Gift Proposed by Date

Gift Approval Form
completed by Date

Gift Authorised by (Director)..... Date

Completed and signed form to be returned to the PA to the Chief Executive

Appendix 4

Approval Form for the Provision of Hospitality

Meeting Date and Time			
Room: internal eg Council, Snow or Committee, or external			
Meeting Purpose			
Senior ACNI Officer attending the meeting			
Number of Participants	Board _____	Staff _____	Guests _____
	Total _____		
Hot and Cold food requirements (please provide details of any special dietary requirements)			
Beverage Requirements			
Time of Delivery			
Approximate Cost			
I am satisfied that the provision of refreshments at the above meeting complies with the Guidance on Hospitality			
Signed	Date	
Authorised	Date	

Completed and signed form to be returned to the PA to the Chief Executive

Appendix 5

Recording Events, Gifts and Hospitality

- **Board Members**

Board members should complete an events, gifts and hospitality form on a monthly basis. This is available in hard copy and it should be signed and forwarded to the Executive Assistant to the Board of the Arts Council on a monthly basis.

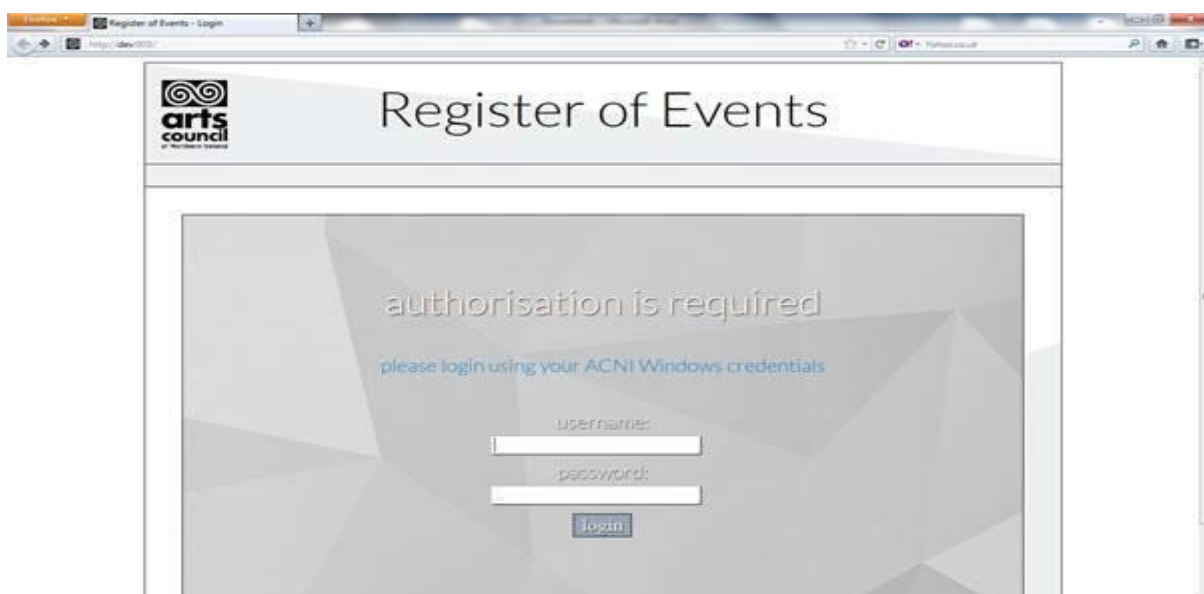
- **Staff Members**

Open the following address in your web browser: <http://edrm:888/roe/>

NB: You should save this to your favourites list on your browser

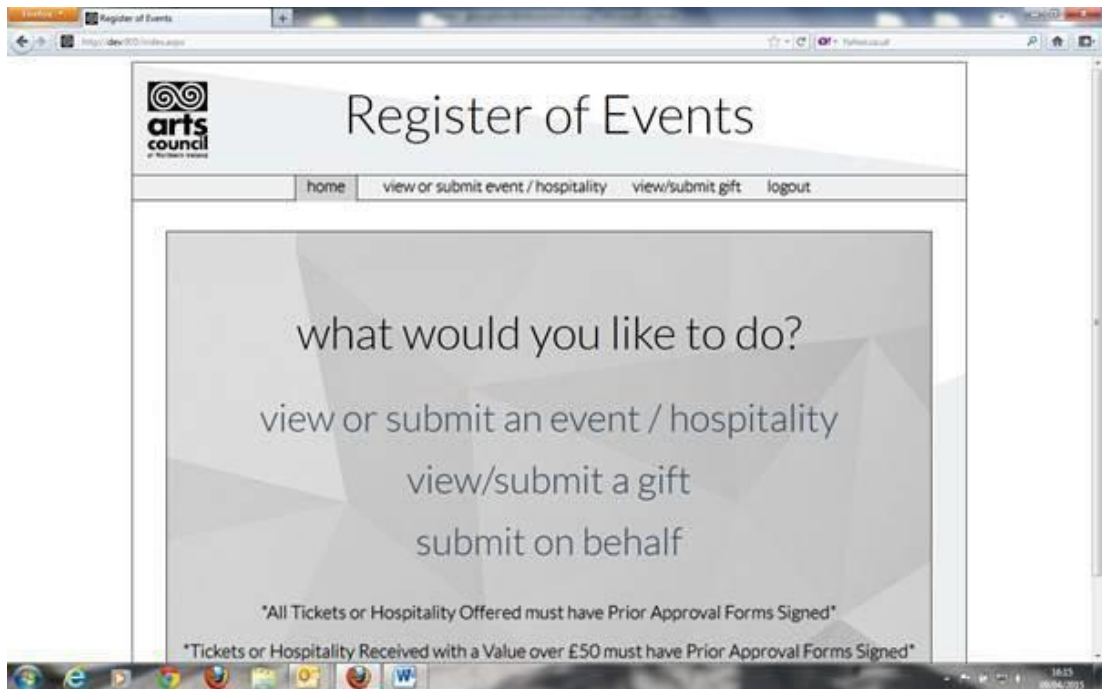
Enter your network username and password. This is the username and password you use to log into your computer.

Click Login

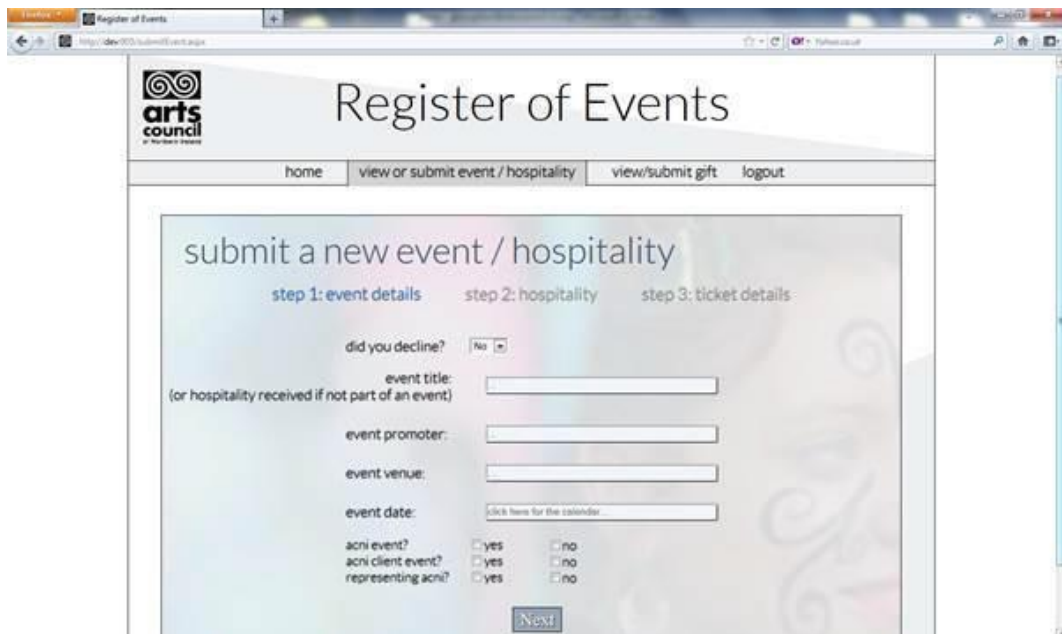


- **Entering an Event**

When you first log in, you will be presented with the screen below. Click on the relevant field.



Next complete the fields as shown below and then click 'next'.



Entering a Gift

To enter a gift, click on the “Please click here to submit a gift” link.

All of the following information must be recorded, where known.

Field Name	Comment
Date	Date event occurred.
Gift Received	Item Received.
Gift Provider	Who was it from?
Estimated Value	Value of gift. This should be estimated if not known accurately. Enter numbers only in this field. If you wish to comment on the value do so in the additional information field (below).
Gift From ACNI Supplier (Y/N)	Was gift received from an ACNI supplier?
Additional Information	Any other relevant information.

- **Editing Entries**

To edit a previously submitted entry click on the Previous Submissions link at the top of the page.

- **Entering Events, Gifts and Hospitality for Other People**

Where a member of staff has been authorised to enter information on behalf of someone else, for example for Board members, they will have an additional option displayed.

Click on Submit on Behalf at the top of the page.

Click on submit an event or click on submit a gift link.

Using the pull down menu choose the person whose information you are updated and submit as normal.

- **Public Information**

Please note this information is collected to meet audit and freedom of information requirements. The information collected is public information and will be made available on the Arts Council website. Therefore please update your information on a regular basis

APPENDIX 6

Template for Return of Offer of Gift/Hospitality

(The content of this template should be tailored to suit each circumstance)

Contact Name
Name of Donor
Address of Donor

Date

Dear

The Arts Council NI operates a Gifts and Hospitality 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 INSERT NAME OF GIFT/HOSPITALITY.

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

Yours