



May 2025

Community Relations Council

Guidance on the Acceptance and Provision of Gifts and Hospitality

Document Control

Summary

This document sets out the CRC guidance on the acceptance and provision of gifts and hospitality.

Key Personnel

Name	Position	Contact Details
Jacqueline Irwin	Chief Executive Officer	info@nicrc.org.uk

Document History

Version	Issue Date	Section	Reason for Update
1.0	4 June 2025	Whole Document	New revised policy

Contents

Introduction.....	3
Section 1: Provision of Gifts and Hospitality.....	5
Section 2: Acceptance/Rejection of Gifts and Hospitality.....	10
Section 3: Recording, Monitoring and Reporting on the Gifts and Hospitality.....	16
Section 4: Roles and Responsibilities in relation to Gifts and Hospitality.....	18
Annex A: Acceptance of Gifts/Hospitality Approval Form.....	20
Annex B: Return of Offer/Gifts Letter Template.....	21

Introduction

Community Relations Council recognises there may be occasions where staff may receive or feel it appropriate to accept or provide gifts or hospitality. As public servants, staff are expected to deliver their duties in line with CRC Code of Conduct which includes specific requirements in relation to the acceptance of gifts, hospitality and rewards.

Expenditure of taxpayers' money on gifts and hospitality is a sensitive matter which can lead to public criticism; therefore care must be taken to avoid exposing Community Relations Council to such criticism. Guidance on the acceptance and provision of gifts and hospitality within the NICS is outlined in [DAO \(DFP\) 10/06](#) (Dear Accounting Officer) and this supporting document sets out the arrangements within CRC.

In relation to the **provision** of gifts and hospitality, the DAO sets out some general principles and main areas to be covered. The relevant part of the guidance for CRC staff in relation to the provision of gifts and hospitality is in Section One.

In relation to the **acceptance** of gifts and hospitality, the DAO sets out the guidance to be adopted by all Departments and agencies. The relevant part of the guidance for CRC staff in relation to the acceptance of gifts and hospitality is included in Section Two.

Section Three outlines the requirements and arrangements for recording, monitoring and reporting on gifts and hospitality, and Section Four outlines the roles and responsibilities in relation to gifts and hospitality.

This guidance does not provide a prescriptive list of gifts and hospitality that can be accepted or provided, but instead provides a framework for decision making.

Offers or provision of gifts or hospitality may arise more frequently in certain Directorates due to the nature of the work, or where the provision or acceptance of a gift or hospitality may be customary or culturally expected, or conversely, where the refusal of a gift or hospitality may cause offence.

Fundamental Principles

Some fundamental principles apply to the acceptance and/or provision of gifts and hospitality.

As set out in the CRC Code of Conduct Policy, CRC staff should conduct themselves with honesty and impartiality in the exercise of their duties. As a consequence, staff must not use public resources for personal benefit or receive benefits of any kind from a third party which might reasonably be seen to compromise their personal judgement, integrity or impartially.

The provision or acceptance of gifts or hospitality must be able to withstand both internal and external scrutiny. Decisions to accept or provide gifts or hospitality must be defensible as being in the direct interest of Community Relations Council, be

proportionate to that interest, within expenditure and acceptance limits, approved appropriately and recorded correctly. Asking the question “could this course of action be satisfactorily defended in public?” is a useful test in both the acceptance and provision of hospitality.

Who the guidance applies to

This guidance applies to **all staff** working within CRC and external people acting on behalf of Community Relations Council (for example, consultants, contracted staff etc). It should also be seen as applying to gifts or hospitality offered to spouses, partners or other associates of an official if it could be perceived that the gift or hospitality would create a conflict of interest for the official.

CRC will continue to ensure, through the Assurance Statement process, that the principles and practices governing this area are reflected within the policies and practices of CRC.

Situations not covered by the guidance

It is recognised that there may be exceptional circumstances where in the interest of Community Relations Council, flexibility in interpretation of the guidelines may be necessary. In such instances, approval must be obtained in writing from the Chief Executive Officer level setting out:

- why the request falls outside the scope of the guidelines;
- why it is considered necessary to provide or receive such gifts or hospitality;
- how it will directly benefit Community Relations Council; and
- the expected consequences of the request being refused.

It is the responsibility of the officer receiving or providing the gift or hospitality to ensure that evidence of the approval is retained and that the gift or hospitality is recorded on the appropriate register as outlined in Section 3.

Review

In line with the requirements set out in the DAO, the guidance on provision of hospitality will be reviewed periodically to ensure that it remains ‘fit for purpose’. The guidance on acceptance of gifts and hospitality will be amended to reflect any agreed NICS guidance updates as required.

Queries

Any queries relating to this guidance should be directed to HR, Governance Manager or the CEO.

Section 1: Provision of Gifts and Hospitality

General Principles

1. As with all public expenditure, gift and hospitality expenditure should be value for money and incurred in accordance with the principles of regularity and propriety¹. Any gifts or hospitality offered should further the Government or taxpayers interest and involve no reasonable suspicion that personal judgement or integrity had been compromised (i.e. a common-sense test).
2. Staff should not use public resources for personal benefit or the personal benefit of colleagues. The quality and extent of any official entertainment, hospitality or gifts being provided should depend on the status and numbers of those being provided for.
3. The rules regarding the provision of gifts and hospitality apply equally in relation to foreign governments or organisations. However, it is recognised that there may be an expectation, or indeed it may be customary or culturally expected, to provide a gift or hospitality as an act of courtesy and where not doing so might cause misunderstanding or offence, in such circumstances gifts or hospitality may be provided.

Provision of Gifts

4. The provision of gifts should not be regarded as part of the normal conduct of CRC business. However, there are some instances where it may be deemed appropriate to provide a corporate gift to an individual or a group.

Approvals and recording of expenditure on gifts

5. The approval of proposed expenditure on gifts, is the same as any expenditure of public money and should follow the guidelines as set out in CRC's Procurement Policy . There are, however, some specific requirements which must be considered in expenditure relating to gifts.
6. For gifts up to the total value of £250 either individually or collectively, prior approval must be sought from the Chief Executive Officer of CRC.

¹ Regularity: compliant with the relevant legislation and wider legal principles such as subsidy control and procurement law, delegated authorities and following the guidance in this document.

Propriety: meeting high standards of public conduct, including robust governance and the relevant Assembly expectations, especially transparency. As outlined in [A.2.4 MPMNI](#)

7. In certain instances, expenditure on gifts requires Board approval and sets out the delegated limits that apply to expenditure that CRC can commit to or incur:
 - any gift(s) to any individual or entity where the value of gift(s) exceeds £250; and
 - any collective gift(s) to any range of individuals or entities, where the value of the gift(s) to any one individual exceeds £250 or when the value of the collective gift(s) exceeds £5,000.
8. In all instances, the relevant Business Case Pro Forma must be completed in full, approved in advance at the appropriate level and retained by the business area. All gifts provided must also be recorded on the appropriate Gifts and Hospitality Register as outlined in Section 3.

Provision of Hospitality

9. There are a range of circumstances in which expenditure on hospitality might arise within Community Relations Council. This section provides guidelines on the situations where hospitality may be provided, the individuals or groups that may be provided with hospitality, the types of hospitality that may be provided and the approval/recording requirements for any hospitality provided. Directorates must ensure that adequate supporting documentation in relation to the provision of hospitality is retained to demonstrate compliance with the requirements set out below.
10. While it is recognised that face-to-face meetings are important in building and maintaining relationships and will be necessary in some instances, staff are reminded to consider the use of virtual meetings as a means of minimising hospitality, environmental considerations, travel and subsistence costs.
11. Particular caution should be exercised when hospitality is provided largely for CRC staff and approval should not be granted when only CRC staff are in attendance. Any expenditure on official hospitality should be contained within approved budgets and of a scale proportionate to the needs of the occasion and the status and number of guests.

Hospitality Provided to Visitors from Outside the Community Relations Council

12. The Community Relations Council will not normally meet expenditure for the provision of lunch / dinner to visitors or for a working lunch unless where a benefit will accrue to Community Relations Council or where such an occasion allows for the conduct of urgent business. In such circumstances, expenditure may be authorised within the following guidelines.

- Approval should not normally be granted when only CRC staff are in attendance. In cases where those CRC staff attending outnumber external (i.e., non-CRC staff) guests, the approval of the CEO should be obtained in advance.
- The number of people invited should be kept to a minimum.
- Any hotels or restaurants used should be appropriate to the purpose. Government establishments should be used wherever possible.
- Any meal should be on a modest scale, with the total cost per head not exceeding £30 and the element for refreshments must not exceed one third of the total bill.
- Where no service charge is included, a tip of 10% is considered reasonable.
- No spouses or guests of CRC staff are eligible to receive official hospitality other than in exceptional circumstances and with the specific agreement of the CEO
- Except where such hospitality constitutes CRC business, CRC funds are not available for visits to theatres or to other forms of public entertainment.

Working Lunches and Refreshments for Official Committees and Other Ad Hoc Meetings

13. The provision of lunch at public expense will be acceptable only where it is impossible to accommodate urgent meetings other than at lunch time and where:

- there is a need to make provision for non-CRC guests;
- it is necessary for participants to remain together over lunchtime; or
- pressure of work is likely to be such as to make it impractical to allow a break long enough to give participants reasonable time to obtain lunch elsewhere (although such cases are likely to be rare).

14. The nature of the lunch should be appropriate to the purpose, with costs kept to a minimum. If morning or afternoon breaks are warranted, light refreshments (tea / coffee / biscuits) may be provided at public expense, at the discretion of the CEO.

Hospitality Offered During Conferences, Workshops and Training Courses etc.

15. A measure of hospitality at public expense may be offered to those participating in training courses, both residential and non-residential. This facility may also be extended to cover conferences, seminars, approved team building sessions, workshops, etc. The following guidelines apply:

Residential (i.e. where at least one night's accommodation is being provided and paid for as an integral part of the course)

- Whilst it is normal practice to meet the cost of meals and light refreshments, i.e. tea / coffee / biscuits / scones, this facility must not be extended to include payments for alcoholic refreshments.
- Expensive hotels should be avoided.
- The total cost of food and refreshment per person should be appropriate to the purpose and costs should be kept to a minimum.

Non-residential

- Depending on the duration of the course / event, hospitality should be restricted to the provision of morning and afternoon tea / coffee with biscuits / scones. The provision of snacks or a buffet-type meal at lunch time will be at the discretion of the CEO who should take into account factors such as the background and number of attendees, the availability of alternative facilities and the benefits (if any) which such provision might offer in terms of the running of the course / event.
- For events in excess of 100 attendees, prior approval should be sought from the CEO. *Where lunch and light refreshments are provided, subsistence expenses will not be payable.* CRC's office should be considered as a first choice of venue and expensive hotels should be avoided.

Provision of Alcoholic Beverages

16. In the provision of alcoholic beverages, the following guidelines should be followed at relevant functions/events.

- Consideration should be given to providing low alcohol alternatives to alcoholic drinks.
- An adequate selection and supply of soft drinks should always be made available.
- On the rare occasions it is deemed appropriate to provide alcoholic drinks it should be limited to one per person. Any additional drinks should be at the expense of the individual.
- Any request to provide alcohol will require the prior written approval of the CEO. Alcohol should only be provided with dinner.

Approvals and recording of expenditure on hospitality

17. As with gifts, the approval of proposed expenditure on hospitality is the same as any expenditure of public money and should follow the guidelines as set out in CRC Gifts and Hospitality policy. This requires the completion of a Business Case Pro Forma based on the proposed level of expenditure.

18. It is expected that all requests for the provision of hospitality should fall within the minor expenditure Business Case Pro Forma for expenditure up to £50k. To assist with the completion of the pro forma in relation to hospitality expenditure, the following information should be included under the appropriate sections within it to enable the authorising officer to make the decision on the provision of the hospitality proposed:

- the justification for the offer of hospitality proposed;
- the type and scale of hospitality proposed;

- a guest list, detailing employing organisations and, if not immediately apparent, reasons for the invitation;
- estimated cost of hospitality proposed and for the guest list including evidence of securing value for money in line with CRC Financial Procedures Policy.

19. In all instances, hospitality being provided up to the value of £5,000, must have the prior approval of the CEO of the business area providing the hospitality.

20. For hospitality over £5,000, or hospitality that includes the provision of alcohol, prior approval must be sought from the Board.

21. In all instances, the appropriate Business Case Pro Forma must be completed in full, approved in advance at the appropriate level and retained by the business area. All hospitality provided must also be recorded on the appropriate Gifts and Hospitality Register.

Processing Expenditure on Provision of Gifts and Hospitality

22. All expenditure on hospitality must be clearly identified as such and charged to the correct cost centre and expense code so as to clearly identify the cost appropriately and accurately. This includes the provision of gifts or hospitality provided by or to CRC staff. Expenditure on hospitality should not be by subsumed into other expense codes. Staff are also reminded to exercise caution and ensure that costs not associated with hospitality are not incorrectly coded as such.

23. Invoices from suppliers in relation to the provision of hospitality should include a breakdown of the cost in terms of room hire, food, tea/coffee/water/juice, alcohol, use of equipment/stationery.

Claims for Reimbursement of Expenditure on Gifts or Hospitality

24. Where prior approval has been granted via a completed Provision of Gifts and Hospitality Approval Form, and the cost of the gift or hospitality has been met by an individual, they can seek reimbursement.

25. The claim form, which can be obtained from CRC's Finance Department, should be completed and submitted to them to initiate the payment process. It should be clearly evidenced that this is a hospitality reimbursement within the description field. If the approver in CRC is different to the officer who granted prior approval, then a copy of the form must be submitted to the that officer. Approvals and all invoices or receipts should then be sent to CRCs Finance Department. The cost of the purchase of any alcoholic drinks **cannot** be reclaimed unless agreed in advance by the CEO.

It is the responsibility of the providing officer to retain appropriate records of requests, approvals and any relevant supporting documentation in relation to the provision of gifts and hospitality.

Section 2: Acceptance/Rejection of Gifts and Hospitality

27. This section provides guidance concerning the ***acceptance*** of hospitality or gifts ***offered to*** CRC staff and includes procedures for the authorisation and recording of such instances.
28. CRC recognises that contractors and other customers of our services may extend from time to time offers of gifts and hospitality to staff. CRC also recognises that its employees have a responsibility, in the interests of public confidence, to exhibit high standards of propriety, and carry out their role with dedication and a commitment to CRC and its core values: integrity, honesty, objectivity and impartiality.
29. This guidance sets out the principles governing the acceptance of gifts and hospitality by staff and provides some specific advice on how these principles should be interpreted across CRC. It is designed to remind staff of their responsibility to exercise judgement and propriety regarding offers of gifts and hospitality.
30. The CRC Staff Handbook indicates that CRC should conduct themselves with honesty and impartiality in the exercise of their duties. As a consequence, they should never receive benefits of any kind from a third party which might reasonably be thought to compromise their personal judgement or integrity. In this field, perception is as important as reality.
- 31. The fundamental principle is that no member of staff should do anything which might give rise to the impression that they have been or might be influenced by a gift or hospitality or other consideration to show bias for or against any person or organisation while carrying out official duties.**

General Principles

32. As CRC staff our standards of conduct are determined by what the Government and the public as taxpayers expect and not by what may be a common practice in the private sector.
33. External people acting on behalf of the CRC (for example, consultants, contracted staff etc) must also abide by the policy. If it is believed that an external person may have breached the policy, the matter should be reported to the CEO or more, who will take the matter forward with the individual or their company. This requirement should be notified to external staff before they start work within CRC.
34. This guidance should also be seen as applying to spouses, partners or other associates if it can be argued or perceived that the gift or hospitality is in fact for the benefit of the official.

35. Any breach of the rules of conduct can lead to disciplinary action and in some circumstances can be a criminal offence. The policy governing the acceptance of gifts, hospitality and awards by CRC is set out in CRC Standards of Conduct Policy. This Guidance focuses on the key issues and the specific rules, which all staff in the CRC should adopt.

Legal Obligations and Fundamental Principles

36. Under the Prevention of Corruption Acts of 1906 and 1916 it is an offence for an officer in their official capacity:

- to corruptly accept any gift or consideration as an inducement or reward for doing, or refraining from doing, anything in that capacity; or
- to show favour or disfavour to any person; or
- to receive money, gifts or consideration from a person or organisation holding or seeking to obtain a Government contract.

37. All of these are deemed by the Courts to have been received corruptly unless it is proven otherwise.

38. The following should also be read in conjunction with this guidance:

- [The Fraud Act 2006](#);
- [DAO \(DFP\) 09/11 - Bribery Act 2010](#); and
- [DAO \(DoF\) 04/17 NIAO Managing the Risk of Bribery and Corruption Guide](#)
- CRC's Fraud Prevention and Response Plan
- CRC Procurement Policy
- CRC Financial Procedures Manual

Acceptance of Gifts

39. The general principle is that all gifts offered should be refused. However seasonal, promotional or trivial gifts (such as calendars, diaries, pens 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 reported or approved in advance.

40. A token gift may be accepted if it is presented by an organisation, however, these and the acceptance of any other gifts must have been approved by management by way of an Acceptance of Gifts/Hospitality Approval form.

41. More expensive or substantial items, valued at **£50** or more, and gifts of lottery tickets, cash, gift vouchers or gift cheques, cannot on any account be accepted.

42. All gifts offered (apart from those which are trivial or inexpensive), even if they are declined/returned must be recorded on the appropriate Gifts and Hospitality Register.

Accepting Trade, loyalty or Discount Cards

43. Trade, loyalty or discount cards by which an officer might personally benefit from the purchase of goods or services at a reduced price are classified as gifts and should be refused or returned to sender.
44. Frequent flyer cards used by airlines can be used by staff to avail of special departure lounges and priority booking and check-in. They must NOT make private use of any flights/air miles, which derive from flights paid for from the public purse.

Staff involved in the procurement or monitoring of a contract.

45. Apart from trivial / inexpensive seasonal gifts, such as diaries, 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.

Accepting Gifts received in recognition of work done

46. On no account should a gift or gratuity be solicited or requested. Where gifts by way of gratuities, vouchers or book tokens etc for lectures, broadcasts or similar occurrences are offered, then acceptance should be based on how much of the preparatory work for the event was done in the officer's own time, how much in official time and the extent to which CRC resources, other than, for example, use of an officially issued lap-top at home, were used in the preparation. The following guidelines should be applied.
 - If the preparation was carried out entirely in the individual's own time and the event took place outside normal working hours at no expense to Community Relations Council it would be acceptable for the individual officer to retain the whole fee, token or other gift.
 - If, however, the preparation was done wholly in CRC time with the use of CRC resources, no gifts or fee should be accepted unless the event is carried out outside of normal working hours when a gift or token to the value of up to **£50** is acceptable.
 - If the preparation was carried out and the lecture etc, delivered in an officer's own time but CRC facilities were used for typing, preparation of PowerPoint / overheads etc, then a gift or token to the value of not more than **£75** is acceptable.
 - In the case of either the last two bullets above, CRC can, if they so choose, charge the organisation or body a fee based on the salary costs of the individual and/or the use of resources. If a series of gifts from the same source exceed the monetary limits set out above the same rules apply.

Accepting Awards or Prizes

47. Staff should consult with the CEO 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 or payment for a publication or invention to which other rules apply.

Approvals and recording of gifts accepted/returned

48. In all instances (apart from those trivial or inexpensive gifts for which approval is not required) where gifts are received, approval should be sought using the Acceptance of Gifts/Hospitality Approval Form and the details recorded in the appropriate Gifts and Hospitality Register.

49. Where it is deemed that approval is required as per above CEO approval should be provided for staff and Board approval should be sought for the CEO.

50. If the recipient has or will reject the offer, they only need to send details HR for inclusion in the appropriate Gifts and Hospitality Register as outlined

51. In each case submitted to them, the approving officer will decide in writing or by email, whether to:

- allow the recipient to keep the gift;
- return the gift to the donor with a suitably worded letter explaining why the gift cannot be accepted. A template has been attached at [Annex B](#) which should be tailored to suit each individual circumstance;
- use or dispose of it, if possible, in or by Community Relations Council; or
- donate the gift to a nominated Charity.

52. The approving officer will ensure that the details of the case and their decision are recorded in the appropriate Gifts and Hospitality Register.

Acceptance of Hospitality

53. 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 judgement. In exercising this judgement it is acknowledged that there can be difficulty in distinguishing between a "gift" and "hospitality". It is also recognised that it can be as embarrassing to refuse hospitality, as it can be to refuse a gift.

Situations where hospitality may be accepted/should be declined

54. Unless accepted on a regular basis from the same provider, conventional hospitality such as tea/coffee/biscuits/working lunches etc can be accepted. In all cases acceptance must be in the interests of Community Relations Council.
55. Hospitality, which would not be acceptable, would include invitations to frequent or more expensive social functions where there is no direct link to official business (sporting events, the theatre, opera or ballet etc), particularly where these come from the same source, and those which involve travel, hotel or other subsistence expenses.
56. It can be argued that if officers are to achieve the best value for money in dealings with suppliers or consultants then they need to build up contacts and that it is quite legitimate for them to have a close working relationship with organisations or individuals, which may involve a degree of hospitality.
57. There may also 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 (subject to prior approval as required from the CEO).
58. Additionally, very occasional acceptance of meals or tickets to public sporting, cultural or social events may be accepted if attendance is justified as being in Community Relations Council's particular business interest. But it will be for the Line Manager to gain the prior permission for this attendance from the CEO and demonstrate clearly that acceptance/attendance was in Community Relations Council interest and the rationale should be documented and retained along with the necessary approvals.
59. 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. To sum up, in deciding whether hospitality can be accepted, staff should consider if it:
- is likely to help business effectiveness;
 - places no obligation or perceived obligation on the recipient;
 - is not frequent, lavish or prolonged;
 - is unconnected with any decision affecting the organisation or the individual offering it;
 - can be justified; and
 - provides benefits to Community Relations Council which outweigh the risk of possible misrepresentation of the hospitality.

Approvals and recording of hospitality accepted/declined

60. When in doubt about accepting hospitality or an invitation, the individual should, in the first instance, consult with HR, the Governance Manager or the CEO.

61. Conventional hospitality such as tea/coffee/working lunches will not usually require approval, nor will it need to be recorded on a register, as long as the receiving officer is satisfied that it aligns with the principles outlined in paragraphs 57-62 above. In all instances where something other than conventional hospitality (infrequent working lunches) is offered, prior approval should be sought using the Acceptance of Gifts/Hospitality Approval Form and the details recorded in the appropriate Gifts and Hospitality Register as outlined in Section 3.

62. Where it is deemed that approval is required as per above CEO approval should be provided for staff and Board approval should be sought for the CEO. In the case of gifts may be accepted after a recorded discussion at CRC Board Meeting.

63. If the recipient has or will reject the offer, they only need to send details to their line manager for inclusion in the appropriate Gifts and Hospitality Register as outlined in Section 3.

64. It is particularly important to ensure that CRC is not overrepresented 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. To guard against the multiple acceptance of invitations to the same event, it is the responsibility of the receiving officer to demonstrate that corporate consideration has been given to all invitations.

65. It is recognised that in some cases the value of hospitality received is not readily apparent. Where this is the case, the following estimated values should be used to ensure consistency across Community Relations Council and across the NICS:

Description	Value (£)
Dinners (including formal black-tie dinners)	60
Lunch	40
Casual Lunch	25
Breakfast / Buffet / Refreshments / Drinks	20

These figures include food, beverages and tips.

66. It is the responsibility of the receiving officer to retain appropriate records of requests, approvals and any relevant supporting documentation in relation to the acceptance of gifts and hospitality.

Section 3: Recording, Monitoring and Reporting on the Gifts and Hospitality

Gifts and Hospitality Registers

67. All instances where gifts and/or hospitality have been provided, accepted or rejected must be recorded on the appropriate gifts and hospitality register. This should include spouses/partners where relevant.

68. Gifts and Hospitality Registers must be maintained at the following levels:

Divisional Gifts and Hospitality Registers

- This register will record all instances of gifts and hospitality provided, accepted or rejected as outlined in this policy for all staff in CRC. This should be regarded as a living document and must be up to date at all times.
- On at least an annual basis, the CEO must review the register and ensure arrangements are in place to ensure adequate evidence of that review is retained.

CRC Board and Committee Members

- CRC will maintain an individual register to record all instances of gifts and hospitality provided, accepted or rejected by them as outlined in this policy by a Board or Committee Members. This should be regarded as a living document and must be up to date at all times.
- CRC will request details of any gifts and hospitality **offered to** all Board Members and Committee Members on an annual basis and this will be published on the CRC's website.

69. The template to be used for all Gifts and Hospitality Registers is available from CRC's Company Folder

The same template must be used by everyone. You should not change the template, but if you feel there is something that should be added or changed, you should speak to HR.

70. It is the responsibility of individuals to ensure that information relating to the provision of and acceptance/rejection of offers of hospitality is complete, accurate, up to date, and appropriately approved at all times.

71. Gifts and Hospitality Registers must be treated as living documents as these can be requested at any time for inspection, audit and through requests for information such as FOIs, Assembly Questions, Media enquiries etc. The ability to provide

robust information quickly is vital in protecting the reputation of Community Relations Council and us as public servants.

Section 4: Roles and Responsibilities in relation to Gifts and Hospitality

Accounting Officer

72. The Accounting Officer has a leadership role in relation to propriety – his or her actions and behaviour should set a high standard for the organisation. The essence of an Accounting Officer's role is a personal responsibility for the propriety and regularity of the public finances for which he or she is answerable; for the keeping of proper accounts; for prudent and economical administration; for the avoidance of waste and extravagance; and for the efficient and effective use of the available resources. The Accounting Officer is also held ultimately responsible under the Bribery Act 2010 for ensuring that Community Relations Council is compliant with this legislation and that, as a result, proportionate steps are taken to prevent bribery.

73. Responsibilities will include taking decisions affecting the provision of hospitality within their Directorates, Divisions and all areas for which they are responsible. The CEO should ensure that the areas for which they are responsible have appropriate arrangements on gifts and hospitality in place.

Line Managers

74. Line Managers should be satisfied that any expenditure on hospitality incurred is in the best interests of Community Relations Council, provides value for money and complies with current policies and guidelines. Line Managers should ensure that all staff are familiar with current guidance.

Employees

75. Employees, or anyone working on behalf of Community Relations Council must not use public resources for personal benefit or provide services to a third party that may be seen to compromise their judgement or integrity. Care should be taken at all times to avoid actual, or potential conflicts of interests, real or perceived.

Approving and Authorising Officers

76. Approving Officers are reminded of their responsibility for ensuring adherence to these guidelines. It is important that the Accounting Officer has a defence against charges that the level of hospitality is excessive or that Community Relations Council's staff are providing or receiving gifts or hospitality at the taxpayer's expense. Where there is doubt about the provision or receipt of gifts or hospitality, Approving Officers should seek advice or err on the side of caution and reject the request for approval. Officers authorising payments are reminded of their

responsibility to ensure that the gifts or hospitality extended has been properly approved.

Internal Audit

77. Internal Audit provides a role in the monitoring of compliance with policies and guidance through internal audit strategies and plans agreed with management which may include a review of this policy.

Annex A: Acceptance of Gifts/Hospitality Approval Form

PART 1 – DETAILS OF OFFER (to be completed by recipient)	
Type:	(i.e. Gift/Hospitality)
Offered to:	Name of Recipient
Name of ultimate recipient:	If not as above (i.e. if gift or hospitality passed on to someone else)
Date of event or date gift offered:	
Who made the offer:	
Description of offer:	
Why was the offer made:	
Estimated/actual value of offer:	
State whether offer was accepted/declined:	
Is there a current/potential contract with the donor?	If yes provide details:
If seeking retrospective approval, provide reason for not requesting approval prior to receipt of gift / hospitality	
Is anyone else from Community Relations Council attending the same event?	If yes provide details and reason you can consider your attendance to also be required.
Signature:	Signed: Date:
PART 2 – APPROVALS (to be completed by approving officer)	
Decision: (Approved/Not Approved)	
Reasons why approval has/has not been granted:	
Is gift being returned? If so, a letter should be issued (template at Annex B to be used)	
Has the gift been used or disposed of? If so give details:	
Has the gift been donated to a nominated charity?	
Has the Gift and Hospitality register been updated?	
Signature of Approving Officer:	Signed: Date:

NB: FORM NOT VALID UNLESS BOTH PARTS 1 AND 2 HAVE BEEN COMPLETED

Annex B: Return of Offer of Gifts/Hospitality Letter Template

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

Contact Name
Name of Company
Address of Company

Name of Business
Manager/Head of Division
Office address

Date

Dear

The Community Relations Council (CRC) operates a Gift 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 in any way meant to offend or to imply that your [gift/hospitality] was offered in anything but the utmost good faith, but is designed to protect both individual members of staff and CRC. I hope you will accept our response in that spirit and that we can look forward to continued effective working relationships.

Yours