

# Gifts and Hospitality Policy - Offers of Gifts and Hospitality Received

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This document is intended for Trinity College London (TCL) personnel and authorised external parties. This document must be handled in accordance with the TCL classification policy.

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# Gifts and Hospitality Policy - Offers of Gifts and Hospitality Received

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## **1.0 Overview**

To ensure that all employees, workers and any other individuals conducting business on behalf of Trinity College London ('Trinity') do not use their official position for personal gain, i.e. to receive gifts, hospitality or benefit of any kind which might reasonably be seen to compromise Trinity's position or the individual's personal judgment and integrity.

## **2.0 Scope**

All Trinity employees and workers. All consultants, fixed term and temporary agency workers or other third-party service providers engaged by Trinity. Members of Trinity's Council and other non-executive committees. All staff and directors of Trinity's branches and subsidiaries.

## **3.0 Roles and responsibilities**

It is the responsibility of every individual covered by the scope of this policy to familiarise themselves with, and to comply with the terms of this policy, and to ensure that an audit trail exists for all offers of gifts and hospitality.

Individuals should ensure that they are referring to the current version of this policy, which is available from the intranet or the People & Culture team.

Failure to comply with this policy may result in the matter being investigated under Trinity's Disciplinary Policy and Procedure, or in the case of workers, contractors or other third-party service providers, the immediate termination of their engagement.

## **4.0 Policy**

Anyone engaged to conduct business on behalf of Trinity should be aware that they are prohibited from using their office for personal gain. In matters relating to gifts and hospitality, perception can be as impactful as actual intent. Even when offers are accepted in good faith, they may be perceived as compromising Trinity's impartiality.

This is particularly relevant where Trinity is tendering for products and/or services from third party providers. Trinity strives to maintain unimpeachable standards of honesty, impartiality and integrity in all its business relationships. The intention of this policy is to set out the rules and guidance to be followed to ensure that it can be demonstrated that no undue influence has been applied by any external organisation, or anyone else dealing with Trinity.

The contents of this policy are not contractual.

Trinity reserves the right to amend this policy, as appropriate, without compensation.

### **4.1 General rules**

Employees and workers shall not use their authority or office for personal gain. Likewise, self-employed contractors or agency workers providing services to Trinity should not use their connection to Trinity arising from their contractual status for personal gain.

Those covered by the scope of this policy have a personal responsibility to ensure that an audit trail exists for all offers of gifts and hospitality by making a disclosure on the Company's [Navex platform](#). See Section 5.0 for further information.

## 4.2 Definition of gifts and acceptance of gifts

Gifts shall not be accepted where they appear to be disproportionately generous or could reasonably be construed as an inducement to affect or influence a business decision.

Where a gift has been accepted, it may not always be permitted for the individual to retain the gift. The final decision as to whether a gift can be accepted rests with the Chief People & Culture Officer and the General Counsel. The gift must be declared to the company (see section on Procedure below).

Where a gift cannot be retained by an individual, it should be displayed in an office in the case of a gift from a visiting organisation, distributed to the team where applicable, or be raffled for or given to charity. The individual receiving the gift should ensure that the donor is made aware of Trinity's policy on the receipt of gifts.

There may be exceptional circumstances, however, when a gift should not be declined. An example would be where an individual is travelling overseas and there are cultural reasons why a gift should be accepted e.g. it could be construed as an insult not to accept it. When making travel plans individuals should seek advice on this matter in advance.

Any individual who has received two gifts from any external organisation within a single financial year must not accept any further gifts during that financial year from the same organisation.

In cases of doubt, any individual concerned about issues relating to the acceptance of a gift or offer of hospitality, should contact either the Chief People & Culture Officer or General Counsel.

Where a possible issue relating to this policy arises, the advice of the Chief People & Culture Officer should be sought.

### 4.2.1 Hospitality

**Invitations to lunch or dinner:** from an external organisation may only be accepted where the primary reason for accepting the invitation is to discuss business matters, either with representatives of the hosting organisation or with other parties that may have business interests or activities in common with Trinity and where the venue and hospitality are not in themselves an inducement to accept the invitation or the purpose of the invitation.

**Invitations to conferences and trade shows:** it is recognised that participation in certain events such as supplier or industry conferences, seminars and trade shows can be of particular value where they support the establishment of relationships with strategic partners or enhance Trinity's profile, knowledge or understanding of a particular area. For such events, the hospitality element should be incidental to the event and relevant business information is expected to be gained through attendance. For these events, should an invitation to a major cultural or sporting event be included, then this invitation should be declined except where the interests of Trinity can be clearly demonstrated.

**Invitations whilst travelling abroad on Trinity business:** it is recognised that business trips hosted by a National Representative, Area Representative or other organisation engaged on supporting Trinity business, are likely to include some form of hospitality, for example, formal receptions, formal dinners, etc. In these circumstances where such hospitality is arranged, and especially where the culture of the country dictates it would be offensive to decline, then it is permitted to accept these offers of hospitality.

**Invitations of a social kind** e.g. sporting and cultural events should be declined except where the interests of Trinity can be clearly demonstrated in advance and the business justification is both compelling and exceptional. In these circumstances, acceptance must be agreed in advance in writing by the Chief People & Culture Officer or General Counsel. .

**Hospitality that includes travel and overnight accommodation** must not be accepted. The only exception to this rule may be when an individual is speaking at a conference or similar event and travel and accommodation is provided by the organisers, and only then with prior written approval of the Chief Executive Officer or General Counsel.

**Repeated invitations** are deemed to be inappropriate, and any individual who has accepted hospitality of a social kind from an external organisation should not accept any further invitations of a similar type from the same organisation within the following twelve months.

## 5.0 Procedure

Where an offer of a gift or hospitality has been made, individuals should complete an online declaration as follows:

- Access the [Navex platform](#).
- Select the “*Disclosure Questionnaires*” option from the left-hand side menu on the landing page and click on “*Browse*”.
- Select the “*Gifts and Hospitality*” option.

Individuals who are not employees of Trinity may need to create a new account on the Navex platform in order to make their disclosure. To do so, follow these steps:

- Access the [Navex platform](#).
- On the login page, click “*Set or reset my password*” (in blue text).
- Enter a valid email address as the username and click “*Continue*”.
- NAVEX One will automatically send an email with instructions to log-in and set a new password.
- Once logged in, individuals should follow the instructions above for completing a disclosure.

If you are not able to use the Navex platform for any reason, please email [peopleandculture@trinitycollege.co.uk](mailto:peopleandculture@trinitycollege.co.uk) who will advise on an alternative method of reporting.

Please complete all fields of the declaration as fully as possible, indicating whether the gift has been accepted or not.

The declaration will be reviewed by the Chief People & Culture Officer and any concerns raised with the reporter at the earliest opportunity.

The People & Culture Team will maintain a Register of Gifts and Hospitality. This Register will be made available as required, for inspection by the Chief Executive Officer, Council Chair and the Chair of the Audit & Risk Committee.

Any individual concerned with procurement on behalf of Trinity should take particular care. Any offer of a bribe or commission made by external organisations, or anyone else dealing with Trinity, must be reported at once to the Chief Executive Officer.

## Change Control

### Change History

The following changes have been made to this document:

Version	Date	Author	Change Summary
0.1	2010-06-01	Director of HR and Corporate Services	Policy implemented
0.2	2012-11-01	Director of HR and Corporate Services	Policy review
0.3	2022-04-22	People & Culture Projects and Data Manager	Policy review: <ul style="list-style-type: none"> <li>- Update HR department to P&amp;C team</li> <li>- In Policy section outline where to access the policy</li> <li>- Transfer policy to new template</li> <li>- Added location to Receipt of Gifts/ Hospitality</li> </ul>
1.0	2023-05-30	Chief People & Culture Officer	Policy updated to reflect: <ul style="list-style-type: none"> <li>- Inclusion of worker status</li> <li>- Minor changes of wording/order to facilitate ease of reading and consistency with new policy template</li> </ul>
1.0	2024-04-02	Chief People & Culture Officer	Annual Policy Review. No changes made.
1.1	2025-06-01	Chief People & Culture Officer	Annual Policy Review. Introduction of new process for reporting gifts & hospitality via Navex platform.

### Change Approval

The changes to this document have been approved by the following personnel:

Version	Date	Approver
0.3	2022-07-11	Audit Committee
1.0	2023-02-30	Policy Management Group
1.0	2024-04-02	Policy Management Group
1.1	2025-07-01	Audit & Risk Committee