

<b>TITLE</b>	<b>GIFTS POLICY</b> <b>Offers of Gifts and Hospitality Received</b>
<b>Objective</b>	To ensure that all staff, Governors and all other individuals conducting business on behalf of Trinity College London ('Trinity' or the 'Company') 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 the Company's position or the individual's personal judgment and integrity.
<b>Scope</b>	All Trinity employees on the payroll. All consultants, fixed term and temporary agency workers engaged by Trinity. Members of Trinity's Council and other non-executive committees. All staff and directors of Trinity's branches and subsidiaries. This policy should be read in conjunction with the Anti-Bribery and Corruption Policy.
<b>Statement</b>	<p>Anyone engaged to conduct business on behalf of Trinity should be aware that they are prohibited from using their office for personal gain. The acceptance of gifts and hospitality is an area where perception is more important than fact, no matter that something is accepted with selfless motives and solely in the interests of the Company, it could be observed as compromising the Company's position. This is particularly relevant where Trinity is tendering for products and/or services from third party providers. The Company strives to maintain unimpeachable standards of honesty, impartiality and integrity in all its business relationships.</p> <p>The intention of this policy is to set out the rules and guidance to be followed to ensure that the Company can demonstrate that no undue influence has been applied by an external organisation, or anyone else dealing with the Company.</p> <p>The contents of this policy are not contractual. An employee should refer to their Trinity Terms and Conditions of Employment for contractual information. However, it is the responsibility of every employee to familiarise themselves with, and to comply with, this policy. Employees should ensure that they are referring to the current version, which is available from the People &amp; Culture Department and is available on the Employee Homepage. The Company reserves the right to amend this policy, as appropriate, without compensation.</p>
<b>General Rules</b>	

	<p>Employees shall not use their authority or office for personal gain. Likewise, self-employed individuals 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.</p>
<p><b>Definition of Gift and Acceptance of Gifts</b></p>	<p>Gifts are defined as items given without the expectation of receiving anything in return.</p> <p>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.</p> <p>Where a gift has been accepted, it may not always be permitted for the individual to retain the gift. The gift must be declared to the Director, People &amp; Culture for inclusion on the Register of Gifts and Hospitality (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 or be raffled for charity at an appropriate time.</p> <p>The individual receiving the gift should ensure that the donor is made aware of the Company's policy on the receipt of gifts.</p> <p>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 local advice on this matter in advance.</p> <p>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.</p>
<p><b>Hospitality</b></p>	<p><b>Invitations to lunch or dinner</b> 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 the Company and where the venue and hospitality are not in themselves an inducement to accept the invitation or the purpose of the invitation.</p> <p><b>Invitations to conferences and trade shows:</b> 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 the Company's profile, knowledge or</p>

	<p>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 the Company can be clearly demonstrated.</p> <p><b>Invitations whilst travelling abroad on Trinity business:</b> it is recognised that when travelling on Trinity business and where business trips are hosted by a National Representative, Area Representative or other organisation engaged on Trinity business, such tours 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.</p> <p><b>Invitations of a social kind</b> e.g., sporting events should be declined except where the interests of the Company 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 Director, People &amp; Culture.</p> <p><b>Hospitality that includes travel and overnight accommodation</b> 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 Director, People &amp; Culture.</p> <p><b>Repeated invitations</b> are deemed to be inappropriate, and any employee who has accepted hospitality of a social kind from an external organisation should not accept any further invitations of a similarly type from the same organisation within the following twelve months.</p>
<p><b>Procedure</b></p>	<p>Where an offer of a gift or hospitality has been made, the individual receiving the offer should complete Annex 1 to this policy: Form of Receipt of Offers of Gifts or Hospitality. This procedure applies whether the offer has been accepted or not.</p> <p>This form should be passed to the Director, People &amp; Culture who will maintain a Register of Gifts and Hospitality. This Register will be made available as required for inspection by the Chief Executive, Chairman, and Chair of the Audit Committee.</p> <p>Any individual concerned with procurement on behalf of the Company should take particular care.</p>

	<p>Any offer of a bribe or commission made by external organisations, or anyone else dealing with the Company, must be reported at once to the Chief Executive.</p> <p>In cases of doubt, where an individual is concerned about issues relating to the acceptance of a gift or offer of hospitality, the matter should first be discussed with the relevant member of the Executive who will escalate the matter as appropriate.</p> <p>Where a possible issue relating to this policy arises, the advice of the Director, People &amp; Culture should be sought.</p> <p>Failure to comply with this policy may result in the matter being investigated under our Disciplinary Policy and Procedure.</p>
<b>Notes</b>	This policy is subject to review at the discretion of Trinity College's Executive and/or as required by changes to legislation.
<b>Effective Date</b>	1 <sup>st</sup> June 2010
<b>Review Date</b>	Reviewed - May 2018 Last Reviewed - August 2021

**ANNEX 1**  
**Form for Receipt of Offers of Gifts or Hospitality**

**To be completed for all offers of gifts or hospitality,  
whether accepted or not accepted**

Name of Recipient	
Job Title/Department	
Description of Gift / Hospitality Offered	
Date Gift / Hospitality Offered	
Name and Address of the organisation that has made the offer	
Business relationship to TCL	
Estimated value	
State whether Accepted or Declined	
Reason for Acceptance / Decline	
Recipient's Signature	
Date	

Please return this form to People & Culture for inclusion on the Gifts/Hospitality Register