Western Health
and Social Care Trust

Gifts & Hospitality Policy

Directorate of Finance, Contracts & Capital Development

Title	Gifts & Hospitality Policy		
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1. INTRODUCTION

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 and hospitality or provide gifts and hospitality to others on behalf of the Trust.

Unpaid Trust staff (volunteers) and external people acting on behalf of the Trust (for example, consultants, contracted staff etc) must also abide by this policy. If it is believed that an external person may have breached the policy, the matter should be reported to the appropriate head of service or director of finance who will take the matter forward with the individual or his/her company.

This policy also applies where gifts or hospitality are offered to spouses, partners or associates, where it could reasonably be perceived that the benefit is intended for the member of staff, in line with department of health guidance.

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.

This policy aims to ensure that Trust employees and others acting on the Trust's behalf are not placed in a position which risks, or appears to risk, conflict in their progression of business activities. It aims to protect employees and appointees under the bribery act 2010 which makes it an offence to receive or offer a bribe (including certain levels of gifts and hospitality). Any breach of the rules of conduct can lead to disciplinary action and in some circumstances can be a criminal offence.

This policy is informed by department of health circular HSC(F) 19-2025, which supersedes HSC(F) 31-2021 for operational purposes. Where relevant principles or requirements from earlier circulars continue to apply and are not in conflict with current guidance, these have been incorporated into this policy. The policy should be read and applied in conjunction with the Trust guidance on conflicts of interest. For the avoidance of doubt, HSC(F) 19-2025, associated Trust guidance, and subsequent departmental guidance shall take precedence.

The Trust is committed to the HSC values of excellence, compassion, working together, openness and honesty. This policy has been developed in accordance with these values.

2. PRINCIPLES

The fundamental principle is that no member of staff should do anything which might give rise to the impression that he/she has been/might be influenced by a gift, hospitality or other consideration to show bias for or against any person or organisation while carrying out official duties.

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

- They must not accept gifts, hospitality 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 declare any private interests relating to their public bodies
- They must base all purchasing decisions and negotiations of contracts solely on achieving best value for money for the taxpayer
- They must refer to their Head of Department 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 or Director of Finance (see appendix 2).

3. LEGAL OBLIGATIONS

The Trust is subject to the Bribery Act 2010, which establishes offences relating to bribery and places a duty on organisations to implement proportionate procedures to prevent bribery and corruption. The Trust has separate Anti-Bribery, Counter-Fraud and Disciplinary policies which set out detailed requirements and sanctions. This policy should be read and applied in conjunction with those policies and the Trust guidance on conflicts of interest.

3.1. Statutory & Governance Context

This policy operates within the statutory, regulatory and governance framework applicable to the acceptance and provision of gifts, hospitality, sponsorship and awards within the public sector.

3.2. Bribery Act 2010

The Bribery Act 2010, which came into force on 1 July 2011, provides the legislative framework for preventing bribery and corruption in both the public and private sectors. The Act repealed previous corruption legislation and introduced a corporate offence of failure to prevent bribery.

3.3. Organisational Responsibilities

Under the Bribery Act 2010, organisations are required to have in place proportionate and adequate procedures designed to prevent bribery and corruption by those acting on their behalf. This includes the maintenance of effective policies, systems and controls to prevent, identify and manage bribery risks.

This policy should be read alongside the Trust's Counter Fraud, Bribery and Corruption arrangements, which set out reporting requirements and organisational response to suspected bribery or improper conduct.

3.4. Procurement & Commercial Governance

Hospitality expenditure and associated purchasing must comply with applicable procurement legislation, Department of Finance procurement policy notes and control limits (as amended or replaced from time to time), together with the Trust's Standing Financial Instructions and delegated authority arrangement

3.5. Conflicts of Interest

Staff must ensure that any actual, potential or perceived conflict of interest arising in relation to gifts, hospitality, sponsorship or awards is identified, declared and managed appropriately, including where a third party is connected to a current or future Trust decision.

3.6. Precedence

Where there is inconsistency between this policy and external statutory, departmental or procurement guidance the external requirement shall take precedence.

3.7. Non-compliance & Accountability

Failure to comply with this policy, the Bribery Act 2010, or associated statutory or guidance requirements may result in disciplinary action and/or referral under the Trust's governance, counter-fraud or disciplinary procedures, as appropriate.

4. ACCEPTANCE OF GIFTS

Any offer, acceptance, decline, return or disposal of a gift must be formally recorded using the Trust's Gifts & Hospitality Declaration and Authorisation Form (Appendix 2), in accordance with the requirements set out in Section 8. Completion of this form is mandatory where a declaration is required under this policy.

Completed forms must be submitted to the relevant Directorate Business Manager (or nominated contact) for inclusion in the Directorate Gifts and Hospitality Register.

For Senior Staff (Band 8A or above), a copy of the completed form must also be submitted to the Chief Executive's Office to support annual collation, review and publication in line with Department of Health transparency requirements.

All gifts offered to staff should be refused in the first instance. Gifts must never be accepted where acceptance could create, or be perceived to create, an obligation, influence or conflict of interest.

HSC(F) 19-2025 defines a gift as something voluntarily donated with no preconditions and without expectation of return, including economically indistinguishable transactions such as donations or long-term loans.

4.1. Cash or Cash Equivalents

Offers of cash or cash equivalents (e.g. lottery tickets, gift vouchers, gift cheques, trade, loyalty and discount cards) 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.

4.2. Trivial or Non-Cash Gifts

Trivial or promotional gifts are normally low-value items such as calendars, diaries or pens and are often branded. Where there is any doubt as to whether acceptance is appropriate, staff must seek advice from line management before accepting. This type of gift can be easily distinguishable from more expensive or substantial items which cannot on any account be accepted.

Apart from trivial/inexpensive seasonal gifts such as diaries etc no gifts or hospitality of any kind from any source can 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.

4.3. 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. Trust Management must be satisfied that the gift could not have been returned. In cases where gifts made to staff exceed £50 in value per staff member, the Trust's Director of Finance 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; or
- Use or dispose of it, if possible, in or by the Trust.

Retention and Disposal of Gifts Held by the Trust

Where a gift is retained by the Trust, it may be used for display or appropriate organisational use. Such items should not normally be retained for longer than five years, after which disposal arrangements must be considered.

Disposal options may include sale, repurposing for Trust use, or other appropriate means in line with Standing Financial Instructions.

4.4. Enhanced Disclosure Obligations for Senior Staff

Enhanced disclosure and recording requirements apply to Senior Staff (Band 8A and above), including the requirement to record all offers of gifts and hospitality, whether accepted or declined. Full details of recording and submission requirements are set out in Section 8.

Such declarations must be submitted in accordance with Section 8.0 of this policy. Information relating to senior staff will be collated annually for review and publication in line with Department of Health guidance and the Trust's transparency arrangements.

4.5. Fees, Honoraria and External Speaking

In line with Department of Health guidance on gifts and hospitality, any fees, honoraria or rewards offered in connection with external speaking, lecturing, media engagement or similar activity must be managed in accordance with the Trust's arrangements for secondary employment and declarations of interest.

5. HOSPITALITY RECEIVED FROM 3RD 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.

Staff cannot claim day subsistence allowance where lunch is provided.

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. In all instances where anything beyond conventional hospitality is offered, the approval of the Head of Service or the Director of Finance should be sought. 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.

5.1. Additional Conditions for Acceptance of Hospitality

In accordance with Department of Health Circular HSC(F) 19-2025 (Section 3, paras 34–39), the following conditions apply to all offers of hospitality, whether accepted or declined:

- Hospitality must not be frequent, lavish, or prolonged.
- Hospitality must not be connected in any way to a decision affecting the organisation or individual offering it.
- Staff must assess the risk of misrepresentation or perception of favouritism before accepting any hospitality
- The number of Trust attendees at an event must be kept to the minimum necessary and should not normally exceed the number of visitors
- In rare circumstances, it may be appropriate for a partner to accompany a senior officer; this should only occur where the nature of the event justifies it.
- These conditions apply in addition to all existing requirements for approval, documentation, and recording of hospitality under Section 8.0 of this policy.

6. AWARDS OR PRIZES

Staff should consult their Head of Service or the Director of Finance 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.

Awards or prizes offered in connection with official duties must be managed in accordance with the same principles, approval, reporting and disposal arrangements that apply to gifts under Section 4 of this policy.

7. SPONSORSHIP FOR ATTENDANCE AT COURSES AND CONFERENCES

Circular HSC (F) 19-2025 provides guidance on sponsorship for public bodies. It notes that public bodies should always aim to prevent any actual or perceived conflicts of interest, or favoured treatment whether implied or otherwise. The offer of financial assistance or sponsorship by commercial or other organisations to attend relevant courses or conferences must be highlighted to your Head of Service or Director in advance on the appropriate form normally used for applying for permission to attend such events. Such sponsorship is permitted on the understanding that its acceptance will not compromise in any way future purchasing decisions either directly or indirectly nor lead to any other conflict of interest involving the individual or the Trust. The appropriate Head of Service or Director must review the nature and level of sponsorship being offered before approving applications to attend courses or conferences. Any sponsorship that could be construed to be in direct conflict with the HSC aim of promoting the health and social well being of the Northern Ireland population should not be accepted in any circumstances e.g. from tobacco companies. The Director of Finance should be consulted for advice in cases of uncertainty.

8. REGISTER OF GIFTS, HOSPITALITY AND AWARDS

8.1. Purpose

To support transparency, propriety and governance assurance, the Trust will maintain formal records of gifts and hospitality offered, accepted, declined or returned. These records may be subject to audit and disclosed in accordance with Freedom of Information and transparency requirements.

Completion of the Trust's Gifts & Hospitality Declaration and Authorisation Form (Appendix 2) constitutes the formal mechanism by which declarations are made under this policy.

8.2. Directorate Registers

Each Directorate / Business Area must maintain a local Gifts and Hospitality Register, updated regularly, capturing all relevant offers and outcomes (including cash and cash equivalents that are refused).

Directors are responsible for ensuring that appropriate arrangements are in place within their Directorate for the maintenance and oversight of Gifts and Hospitality Registers. The Trust will issue communication and guidance to Directors and Directorate Business Managers to support consistent implementation of these requirements.

Directors are accountable for ensuring compliance with this policy within their Directorate, including the completeness and accuracy of Gifts and Hospitality registers.

8.3. Senior Staff Recording and Central Collection

All gifts and hospitality offered to senior staff (Band 8A or above), whether accepted or declined, must be recorded using the Trust's approved form. Directorate Business Managers (or nominated Directorate contacts) are responsible for ensuring that relevant information is forwarded annually to the Chief Executive's Office.

The Chief Executive's Office will collate senior staff declarations annually for review and publication in line with Department of Health guidance and Trust transparency arrangements.

8.4. Templates and Retention

Registers must be maintained using the approved Gifts & Hospitality Register Template (Appendix 3) and retained in line with records management requirements to support audit, governance and assurance review.

9. PROVISION OF GIFTS, HOSPITALITY AND AWARDS

The paragraphs below provide a guide for staff when considering the provision of hospitality, gifts or awards. If in doubt, the Director of Finance should be consulted before any expenditure is committed.

All proposals for the provision of hospitality must be considered in line with the Approval Matrix contained within Appendix 4. This includes circumstances relating to staff recognition and long service, where hospitality may be provided only on an exceptional and proportionate basis, subject to prior approval. All such proposals must be referred to the Director of Finance and/or Chief Executive for consideration, recognising the need for consistency, transparency and alignment with public sector standards. In all cases, hospitality expenditure must be defensible, represent value for money, and be supported by a clear business rationale. Where any proposed hospitality falls outside established arrangements or defined categories, formal approval must be sought from the Director of Finance or Chief Executive, in advance of any commitment.

No commitments or expenditure must be incurred prior to the required approvals being obtained.

9.1. Internal Hospitality

Internal hospitality (including food and refreshments for meetings, training, events or functions) must be managed strictly in accordance with the Trust's Internal Hospitality Procedure and the Approval Matrix set out within Appendix 4. . Staff must not commit Trust funding for internal hospitality unless explicitly permitted by that Procedure and appropriately authorised.

9.2. 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. Expenditure on external hospitality should be clearly identified as such and charged to a specific hospitality expense code. Staff should refer to the Trust's Use of External Venues and/or Hospitality Procedure, as amended or replaced from time to time.

A proportionate business case must be prepared and approved for all conferences or external hospitality, demonstrating best value for money.

9.3. Staff Recognition And Long Service Hospitality

The Trust may, in exceptional circumstances, provide modest hospitality to recognise long-standing service or significant contribution by staff. Such arrangements must not be routine and must be applied consistently across the organisation.

All such proposals must be referred to the director of finance and/or chief executive for prior approval and must be supported by a clear business rationale demonstrating value for money and alignment with organisational objectives.

9.4. Hospitality Supported Through Endowments and Gifts

The Trust recognises that certain charitable or endowment arrangements may operate under specific procedures relating to the use of Endowments and Gifts (E&G) funds. Where hospitality is facilitated or supported through such arrangements, the application of this policy should be considered in conjunction with the relevant E&G governance procedures.

Where hospitality is funded through Endowments and Gifts (E&G) Funds, prior approval must be obtained from the Endowments and Gifts Committee in accordance with Trust governance arrangements.

Any areas where alignment or clarification may be required will be referred through the appropriate internal governance route for review. Until such consideration has taken place, managers and staff are advised to ensure that decisions relating to hospitality funded through E&G arrangements continue to reflect the principles of openness, accountability, proportionality, and integrity that underpin this policy.

9.5. 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 before hospitality is provided and such approval should be formally documented.

9.6. In exceptional cases, where a proposed arrangement falls outside the parameters set out in this policy or the Approval Matrix, prior written approval must be obtained from the Chief Executive, supported by a clear justification outlining why the proposal falls outside standard arrangements and why it is considered necessary. **Authorisation and Approval of Hospitality**

The purchase of hospitality must follow the Trust's normal procurement and financial control procedures, standing financial instructions and delegated authority arrangements. Where hospitality is permitted, written approval is required in advance and must specify the venue, guest list, cost and nature of the hospitality. Director-level approval is required for formal functions. Documentation retained for audit must be proportionate to the nature and value of the hospitality and may include, as appropriate, a request for permission, guest list, written approval, procurement evidence, receipts or invoices, and a proportionate business case.

All hospitality procurement must comply with relevant procurement legislation, DoF Procurement Policy Notes (including PPN 04/21 or successor guidance), and the trust's standing financial instructions.

Notwithstanding those circumstances indicated above where specific approval is required from the Chief Executive or Director of Finance, authorisation for, and approval of, hospitality expenditure should be obtained in accordance with the Trust's Schedule of Delegated Authority, subject to the requirements of this policy and the Approval Matrix, which take precedence where specified.

9.7. Provision of Gifts and 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.

10. REVIEW OF POLICY

This policy will be reviewed in three years following approval, or sooner in the event of significant change in legislation, guidance or Trust practices.

11. EQUALITY STATEMENT

In line with duties under the equality legislation (Section75 of the Northern Ireland Act 1998), Targeting Social Need Initiative, Disability Discrimination and the Human Rights Act 1998, an initial screening exercise to ascertain if this policy should be subject to a full impact assessment has been carried out. The outcome of the equality screening for this policy, procedure, guideline or protocol is:

☐ Major impact
☐ Minor impact
☒ No impact.

12. APPENDICES

Appendix 1: Seven Principles of Public Life
Appendix 2: Gift, Hospitality, Declaration and Authorisation Request Form
Appendix 3: Register Template
Appendix 4: Approval Matrix

13. SIGNATORIES

Eimear McCauley

______________________________ **Date: 7th July 2026**

Eimear McCauley

Director of Finance, Contracting & Capital Development

APPENDIX 1

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
(To be completed by recipient)

GIFT / HOSPITALITY DECLARATION AND AUTHORISATION FORM
(For gifts, hospitality, invitations, awards or similar offers – whether accepted, declined, returned or disposed of)

1. RECIPIENT DETAILS:	
Name of recipient:	
Job Title/Role:	
Directorate/Business Area:	
Staff category (tick one): ☐ Senior staff (Band 8A+) ☐ Non-senior staff	
Name of Ultimate Recipient *(if different to above i.e. if offer accepted on behalf of Trust or passed on)*	
2. OFFER DETAILS:	
Date of offer:	
Who made the offer (individual/organisation):	
Description of the offer:	
Purpose/context of offer *(e.g. event, role, business relationship, engagement activity)*	
Estimated / actual value of offer (£):	
3. DECISION AND OUTCOME	
Outcome (tick one): ☐ Accepted ☐ Declined ☐ Accepted on behalf of the Trust ☐ Returned to donor ☐ Disposed of in accordance with Trust procedures	
If declined or returned, please state reason *(if applicable)*:	
4. CONTRACTUAL/BUSINESS RELATIONSHIP CHECK	
Is there a current, recent or potential contract, procurement exercise or business decision involving the donor? (tick one): ☐ Yes ☐ No	
If yes, provide details:	
5. **APPROVAL** (where required) *(Required where acceptance is permitted under policy, and mandatory for all offers to Senior Staff)*	
Name of approving officer:	
Role/designation:	
Date of approval:	
6. DECLARATION I confirm that the information provided above is accurate and complete and that this declaration is made in accordance with the Trust's Gifts & Hospitality Policy and Department of Health Circular HSC(F) 19-2025.	
Signature of recipient:	
Date of signature:	
7. SUBMISSION AND RECORDING:	

- All staff:

Once completed, submit this form to your Directorate Business Manager (or nominated Directorate contact) for inclusion in the Directorate Gifts and Hospitality Register.

- Senior Staff (Band 8A or above):

A copy of this completed form must also be forwarded to the Chief Executive’s Office for annual collation, review and publication in line with Department of Health transparency requirements.

APPENDIX 3

REGISTER TEMPLATE

ID No.			
Name of Recipient			
Job Title/Role			
Directorate			
Band			
Date Offered			
Date Declared			
Organisation/Donor			
Description of Offer			
Context of Offer			
Estimated Value			
Decision & Outcome			
Reason why (if declined/returned)			
Is there a contractual/business relationship?			
If yes, details			
Name of Approver			
Role/Designation			
Date of Approval			
Submitted to CE Office (Band 8A+)			

APPENDIX 4

APPROVAL MATRIX

Scenario	Is Approval Required?	Who Must Seek Approval?	Approving Authority	Additional Conditions / Notes
Trivial / low-value gifts (e.g. promotional items)	Not normally required *(unless doubt exists)*	All staff	Line Manager / Head of Service (if required)	Where there is any doubt, advice must be sought before acceptance
Gifts over £50 (exceptional cases only)	☑ Yes	All staff	**Director of Finance**	DoF determines outcome: accept, return, or retain for Trust use
Exceptional gifts (cannot reasonably be refused)	☑ Yes	All staff	Director of Finance / Trust Management	Must demonstrate why refusal was not possible
Cash or cash equivalents	✖ Not permitted	N/A	N/A	Must always be declined – no approval pathway permitted
Gifts where conflict of interest exists or is perceived	✖ Not permitted	N/A	N/A	Acceptance prohibited regardless of value or seniority
Hospitality – routine / low-cost (e.g. working lunch)	Not normally required	All staff	N/A	Must remain proportionate, infrequent and defensible
Hospitality – beyond conventional / higher value	☑ Yes	All staff	Head of Service or Director of Finance	Approval must be obtained prior to acceptance
Hospitality during procurement or contract activity	✖ Not permitted	N/A	N/A	Must not be accepted in any circumstances
Repeated / frequent hospitality from same source	☑ Yes (and generally discouraged)	All staff	Head of Service / Director of Finance	Likely to be refused due to perception of favouritism
Sponsorship (courses/conferences)	☑ Yes (in advance)	All staff	Head of Service or Director	Must not create actual or perceived conflict of interest
Awards or prizes linked to official duties	☑ Yes	All staff	Head of Service or Director of Finance	Must meet criteria and not constitute a disguised gift
Provision of hospitality by the Trust (general)	☑ Yes (in advance)	All staff arranging event	In line with Delegated Authority (unless otherwise stated)	Must comply with SFI, procurement rules and value for money requirements

Scenario	Is Approval Required?	Who Must Seek Approval?	Approving Authority	Additional Conditions / Notes
Formal functions (Trust-hosted)	☑ Yes	All staff arranging	**Director-level approval**	Required regardless of value
Hospitality funded from Endowments & Gifts (E&G)	☑ Yes	All staff arranging	**Endowments & Gifts Committee** (plus any additional approval required)	Must comply with E&G governance arrangements and this policy
Staff recognition / long service hospitality (e.g. up to £100)	☑ Yes (mandatory)	All staff arranging	**Director of Finance and/or Chief Executive**	Must: • Be exceptional (not routine) • Be proportionate and represent value for money • Be applied consistently across the organisation • Be supported by a clear business rationale • Comply with Internal Hospitality Procedure and SFI • Be approved in advance prior to any commitment
Situations not covered by the policy	☑ Yes	All staff	Director of Finance or Chief Executive	Approval must be sought before proceeding
Exceptions requiring flexibility outside policy rules	☑ Yes (written approval)	All staff	**Chief Executive**	Must include clear justification and be formally documented