

POLICY DOCUMENT

Gifts and Hospitality - Policy on the provision and acceptance of:

Policy Review Schedule

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Policy Owner: Administrative Director

Amendment Overview

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2004 - 2.0	01/09/2004		Revised to reflect re-constitution as NIMDTA	
2006 - 3.0	12/09/2006		Further revisions to reflect recommendations from Internal Audit	
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2009 - 4.0	6/08/2009		Issued to staff	
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2011 – 5.0	15/09/2011		Presented to NIMDTA Board for Approval. To be brought back to G&R Committee for approval before presentation to NIMDTA Board on 17/11/2011	
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2011 - 5.1	17/11/2011		Presented to NIMDTA Board for Approval. Approved by NIMDTA Board	
2011 – 5.2	19/06/2013		Role of NIMDTA to be included at beginning of each policy and corporate document. Footer updated to include new NIMDTA mission statement	Linda

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2016 - 7	8/02/2016	6,12,13	Policy amended to reflect DAO (DFP) 02/16 – Guidance on Activity/ Event Sponsorship and of Partnership Marketing and presented to SMT for approval	Margot Roberts
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Role of the Northern Ireland Medical and Dental Training Agency

The Northern Ireland Medical and Dental Training Agency (NIMDTA) is an Arm's Length Body sponsored by the Department of Health, Social Services and Public Safety (DHSSPS) to train postgraduate medical and dental professionals for Northern Ireland. NIMDTA seeks to serve the government, public and patients of Northern Ireland by providing specialist advice, listening to local needs and having the agility to respond to regional requirements.

NIMDTA commissions, promotes and oversees postgraduate medical and dental education and training throughout Northern Ireland. Its role is to attract and appoint individuals of the highest calibre to recognised training posts and programmes to ensure the provision of a highly competent medical and dental workforce with the essential skills to meet the changing needs of the population and health and social care in Northern Ireland.

NIMDTA organises and delivers the recruitment, selection and allocation of doctors and dentists to foundation, core and specialty training programmes and rigorously assesses their performance through annual review and appraisal. NIMDTA manages the quality of postgraduate medical and dental education in HSC Trusts and in general medical and dental practices through learning and development agreements, the receipt of reports, regular meetings, trainee surveys and inspection visits. It works in close partnership with local education providers to ensure that the training and supervision of trainees support the delivery of high quality safe patient care.

NIMDTA recognises and trains clinical and educational supervisors and selects, appoints, trains and develops educational leaders for foundation, core and specialty medical and dental training programmes throughout NI.

NIMDTA is accountable to the General Medical Council (GMC) for ensuring that the standards set by the GMC for medical training, educational structures and processes are achieved. The Postgraduate Medical Dean, as the 'Responsible Officer' for doctors in training, has a statutory role in making recommendations to the GMC to support the revalidation of trainees. Revalidation is the process by which the GMC confirms that doctors are up to date and fit to practice. NIMDTA also works to the standards in the COPDEND framework for the quality development of postgraduate Dental training in the UK.

NIMDTA enhances the standard and safety of patient care through the organisation and delivery of relevant and valued career development for general medical and dental practitioners and dental care professionals. It also supports the career development of general medical practitioners and the requirements for revalidation through the management and delivery of GP appraisal.

NIMDTA aims to use the resources provided to it efficiently, effectively and innovatively. NIMDTA's approach to training is that trainees, trainers and educators should put patients first, should strive for excellence and should be strongly supported in their roles.

Policy Influences

This policy has been influenced by the following:

- Circular HSS(F) 35/2009
- Circular FD (DFP) 11/09
- Circular DAO (DFP) 10/06
- NICS Guidance on the Acceptance of Gifts and Hospitality
- Prevention of Corruption Acts of 1906 and 1916
- Bribery Act 2010*
- Circular DAO (DFP) 02/16

* NIMDTA recognises the responsibilities placed upon it through the introduction of the Bribery Act 2010, and seeks to promote a corporate culture where no form of corruption is tolerated. A bribe is a financial or other advantage intended to induce or reward the improper performance of a person's function or activity, where benefit could create a conflict between personal interests and business interests.

If an incident occurs that may fall within the auspices of the Act, or NIMDTA is informed that such an incident may have occurred, it shall be investigated in line with the procedure identified in NIMDTA's Complaints Policy (section 6 iii).

Policy Impacted

Changes to this policy may have an impact on the following:

- Code of Conduct for NIMDTA employees
- Code of Practice for Board Members
- Authorisation Framework

1. Introduction and Purpose

The Department of Health, Social Services and Public Safety requires the Northern Ireland Medical and Dental Training Agency to have the necessary mechanisms in place to ensure regularity and propriety of expenditure in relation to hospitality.

The purpose of this policy is to give clear guidance on the provision of hospitality, when and to whom it can be extended, the type and scale of hospitality allowed, and the procedures to be followed when authorising or accepting gifts or offers of hospitality.

The policy also sets out the monitoring arrangements to ensure that the procedures for authorising and accepting offers of gifts and hospitality are operating effectively.

2. Legal Obligations and Fundamental Principles

Under the Prevention of Corruption Acts of 1906, 1916 and the Bribery Act 2010 it is an offence for an officer in his/her official capacity to:

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

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

3. Provision of Hospitality

3.1 Definition of Hospitality

Hospitality refers to refreshments and entertainment of any type provided out of public funds to any representative of a public or private body or organisation, or a private individual.

3.2 Justification for the Provision of Hospitality

Hospitality extended should on every occasion be in the direct interest of NIMDTA.

3.3 Scale of Hospitality

Official entertainment should be, and should be seen to be, unostentatious and on a modest scale.

When choosing venues for meals the more expensive hotels and restaurants should be avoided unless there are compelling reasons such as the availability of particular facilities. Where practicable, functions should take the form of lunch rather than dinner.

A fixed price menu should normally be agreed in advance. If no service charge is included in the bill a tip of up to 10% would be reasonable.

Alcoholic beverages will not normally be provided.

3.4 Recipients of Hospitality

Hospitality may be extended to:

- Members of NIMDTA, its sub-committees and specialty training committees
- Members of Appointment and Assessment Panels
- Speakers/lecturers and, in some circumstances delegates, at training courses/conferences organised by NIMDTA
- Members of Inspection Teams for the approval of training posts

3.5 Classes of Hospitality

Committee Meetings/Appointment and Assessment Panels

Refreshments should normally be limited to tea/coffee and biscuits/scones. Working meals may be served where considered to be appropriate. Written approval for such expenditure is not required unless it exceeds the limits set out in Appendix 1.

Training Courses/Workshops/Conferences

Residential

Residential courses will not normally be provided but any such course must have the written approval of the Chief Executive. Delegates may be charged a fee to cover the cost of the hospitality afforded.

Non-residential

Light lunch may be provided where it facilitates the running of the course or where alternative provision is not available.

Delegates may be charged a fee to cover the cost of the hospitality afforded.

Hospitality for Inspection Teams

Evening meals may be provided in some circumstances but only with the written approval of the Chief Executive.

Situations not specifically covered by guidelines

It is recognised that there may be cases when, in the interests of NIMDTA, flexibility in interpretation of the strict rules may be necessary. Approval for such situations must be obtained from the Chief Executive.

3.6 Authorising payment for hospitality

Expenditure on hospitality must be authorised by:

- The Chairman of the Audit Committee for expenditure incurred by the Chairman of NIMDTA.
- The Chairman for expenditure incurred by the Chief Executive/Postgraduate Dean and members of the Board.
- The Chief Executive/Postgraduate Dean for expenditure incurred by the Postgraduate Dental Dean, Director of General Practice Education, Associate Deans, Administrative Director and all other members of the Senior Management Team
- The Chief Executive/Postgraduate Dean or Administrative Director for expenditure incurred by Heads and Deputy Heads of School and, Training Programme Directors
- The Director of Postgraduate General Practice Education for expenditure incurred by the Associate Directors, GP Training Programme Directors and Tutors
- The Postgraduate Dental Dean for expenditure incurred by the Dental Advisers and Training Programme Directors
- The Administrative Director for expenditure incurred by administrative support staff

- The signature on the invoice of a member of senior management will authorise payment.

Where a price has been negotiated in advance there should be no variation between the approved and actual cost. Where it has not been possible to negotiate a fixed price and the actual cost varies by more than 10% or £30 from the approved estimate (whichever is the lower), an explanation of the variation should be documented.

3.7 Responsibility of Authorising Officers

Authorising officers are reminded of their responsibility for hospitality extended under their authority and for ensuring adherence to the policy.

Officers authorising payment are reminded of their responsibility to ensure that the hospitality extended was properly approved.

The Chief Executive/Postgraduate Dean as the Accounting Officer is responsible for ensuring that the level of hospitality across all departments within NIMDTA is not excessive or that those employed by or acting on behalf of NIMDTA are not being entertained at the taxpayers expense.

Any breach of the rules may lead to disciplinary action and in some circumstances can be a criminal offence

3.8 Documentation

The purchase and payment for hospitality bought must be approved, authorised and documented in the same manner as the purchase of any type of good or service.

Documentation must include:

- Written approval, where required, for the type and scale and estimated cost of hospitality proposed;
- A complete guest list, detailing, if not immediately apparent, reasons for invitation;
- If appropriate, evidence of having sought the best “deal”;

- Receipts/invoices detailing separately the purchase of food, drink and any other type of entertainment.

Copies of all documentation should be held in the Finance Department and made available for audit inspection.

3.9 Identification of Hospitality Expenditure

All expenditure on hospitality should be clearly identified as such and charged to the expense code for hospitality. It is not permissible to subsume expenditure on hospitality within other expense codes.

4. Acceptance of Gifts and Hospitality

4.1 Record of Gifts, Hospitality And Awards

All instances of gifts, hospitality, awards and invitations offered must be recorded in the Hospitality Register (Appendix 2) which will be available for periodic review. The register is subject to Freedom of Information (FOI) requests and staff should bear this in mind when deciding on the acceptance of any gift or hospitality.

4.2 Roles and Responsibilities

It is the responsibility of each Head of Department to ensure that staff within his/her Department are aware of the requirement to record all offers and acceptances of hospitality and gifts.

Senior Management will review the Registers on an annual basis. The information will be collated onto a Central Register held within the Chief Executive's Office.

Staff should ensure that acceptance of hospitality or gifts does not compromise their personal judgement or integrity. They should not do anything that would give rise to the impression that they have been influenced by a gift or hospitality to show bias for or against any person or organisation whilst carrying out official duties.

4.3 Acceptance of Gifts

In general 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. Acceptance of any other gift must be approved by the Head of Department in advance and must be declared by the member of staff in the Departmental Register.

Where a staff member receives a small gift to a value less than or equal to £20, for example as a thank you for work well done, and where it would seem rude or unappreciative to return the gift, the Head of Department can approve the gift on the basis that it is retained for the benefit of the gift recipient's team or department. For example a £20 gift card should be used to purchase items for a team event or celebration. Items such as flowers or chocolates should be placed in the team office. A form (Appendix 3) should be completed to register all gifts retained in this manner.

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. All gifts offered (apart from those which are trivial or inexpensive), even if they are declined or returned need to be recorded in the register.

4.4 Trade, Loyalty or Discount cards

Trade loyalty or discount cards by which an member of staff might personally benefit from the purchase of goods or services at a reduced price are classified as gifts and should be refused and returned to sender.

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.

4.5 Financial Sponsorship

Sponsorship by a pharmaceutical company for a particular activity or educational event is also regarded as a gift. In accepting sponsorship staff should aim to prevent any actual or perceived conflicts of interest or favoured treatment. Sponsorship should only be used to enhance activities, not to create them and NIMDTA should not appear to endorse the sponsoring company or its products.

Staff should ensure that any sponsorship availed of is proper and proportionate and in keeping with Managing Public Money NI.

All sponsorship agreements should be in writing. For financial activities a full contract should be drawn up prior to money exchanging hands and appropriate legal advice sought. Where no money is exchanged a letter of agreement may be sufficient.

Where prizes or other assets or benefits are provided by the sponsor they should be used appropriately ie for the purpose intended. They should not be used for the personal use of staff or management. Offers or receipt of gifts and hospitality from sponsors should be recorded in the Hospitality Register.

4.5 Staff involved in the procurement or monitoring of a contract

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.

4.6 Gifts received in recognition of work done

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 before the event was done in the officer's own time, how much in official time and the extent to which NIMDTA resources, other than for example use of an officially issued lap-top were used in the preparation. The following examples provide guidance:

- a) 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 NIMDTA it would be acceptable for the member of staff to retain the whole fee, token or other gift.
- b) If the preparation was done wholly in NIMDTA time and with the use of NIMDTA 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.
- c) If the preparation was carried out and the lecture etc, delivered in an officer's own time but NIMDTA facilities were used for typing, preparation of powerpoint/overheads etc then a gift or token to the value of up to £75 is acceptable.

In the case of either b or c NIMDTA may charge 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.

4.7 Approval of Gifts

If gifts (apart from those trivial or inexpensive gifts for which approval is not required (para 6.3) are received the approval of the Head of Department should be sought using Form A1 (Appendix 3). In the case of Heads of Department hospitality may be accepted following discussion with the Chief Executive. The Chief Executive is required to seek the approval of

the Chairman prior to accepting gifts. If the member of staff has rejected the gift he/she should send details to their line manager for inclusion in the Departmental Register

The Head of Department will decide whether the recipient is

- allowed to keep the gift
- whether the gift should be returned to the donor
- use or dispose of the gift
- donate the gift to a charity

The details of the gift received and decision of the Head of Department will be recorded in the Departmental Register

The recipient will return the gift using NIMDTA template (Appendix 4)

4.8 Acceptance of Hospitality

In accepting hospitality staff need to be aware of and guard against, the dangers of misrepresentation or perception of favouritism by the competitor of the host.

Modest hospitality provided it is normal and reasonable in the circumstances, eg. lunches/dinners in the course of working visits, may be acceptable.

Hospitality which would not be acceptable would include invitations to frequent or 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. A checklist is provided in Appendix 5.

Occasional acceptance of meals or tickets to public sporting, cultural or social events may be accepted if attendance is justified as being in NIMDTA's particular business interest. In such circumstances the Head of Department will be required to demonstrate that acceptance is in the interests of NIMDTA.

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
- Provides benefits to NIMDTA which outweigh the risk of possible misrepresentation of the hospitality

4.9 Reporting Hospitality and Approval Process

In all instances where other than conventional hospitality (eg infrequent working lunches) is offered, the approval of the Head of the Department should be sought using form A1. In the case of Heads of Department hospitality may be accepted following discussion with the Chief Executive. The Chief Executive is required to seek the approval of the Chairman prior to accepting gifts.

If the member of staff has rejected the offer of hospitality they are required to send details to their line manager for inclusion in the departmental register. It is particularly important to ensure that NIMDTA 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.

4.10 Awards or Prizes

Staff should consult with their line manager 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 person achievement
- It is not in the nature of a gift nor can it be construed as a gift, inducement or payment for a publication or invention to which other rules apply

4.11 Hospitality and Subsistence Claims

It is not appropriate to submit claims for subsistence allowance when lunch and/or evening meal has been provided free of charge.

Appendix 1 - Prescribed Maximum Expenditure Limits for the Provision of Hospitality

1. Hospitality for Internal Meetings:

- Maximum Limit: £5 per head

2. Residential or Non-Residential Events Organised by NIMDTA:

- Lunch - £10 per delegate
- Evening Meal - £20 per delegate

3. Extension of Hospitality to Individuals External to NIMDTA:

- Lunch - £20 per Head
- Evening Meal - £30 per Head
- Beverages - one third of cost of meal

4. Provision of Nominal Gifts to Guest Speakers, Volunteers etc:

Small gifts or gift tokens may be provided to a maximum value of £50

Appendix 2 – Register of Gifts, Hospitality and Awards

Northern Ireland Medical and Dental Training Agency

Year:

REGISTER OF GIFTS, HOSPITALITY AND AWARDS

Date of Offer	Offered to	Ultimate recipient (if different)	Offered from	Description of offer	Reason for offer	Details of contracts – current or potential	Est./ actual value of offer £	Action take ie accepted/ refused/ returned	Entered by	Entered date	File ref:

Appendix 3 – Gift/Hospitality Form A1

(Part 1 to be completed by recipient – Part 2 overleaf to be completed by approving officer)

GIFT/HOSPITALITY FORM A1 (Part 1) AUTHORISATION/OFFER ACCEPTED/OFFER DECLINED	
Name of recipient	
Name of ultimate recipient if not as above (ie if gift or hospitality passed on to someone else)	
Date of offer	
Who made the offer?	
Description of offer	
Why was the offer made?	
Estimated/actual value of offer	
State whether offer was declined	
Is there a current/potential contract with the donor? If yes provide details	
Signature of recipient	Signed: Date:

PLEASE TURN OVER FOR PART 2 TO BE COMPLETED BY THE APPROVING OFFICER

GIFT/HOSPITALITY FORM A1 (Part 2)
(AUTHORISATION/OFFER ACCEPTED/OFFER DECLINED)

Reasons why approval has/has not been granted	
Is gift being returned? If so a letter should be issued (template at Annex C 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 gifts and hospitality register been updated?	
Signature of Approving Officer	Signed: Date:

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

Appendix 4 - Template for Return of Offer of Gift/Hospitality

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

Reference

Date

Contact name

NIMDTA Address

Name of company

Address of company

Dear

The Northern Ireland Medical and Dental Training Agency (NIMDTA) 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 NIMDTA. I hope you will accept our response in that spirit and that we can look forward to continued effective working relationships.

Yours sincerely

Head of Department

Appendix 5 - Offers of Hospitality Checklist

Type of gift/hospitality	Approval required
Seasonal, promotional or trivial gifts up to the value of £50 (ref: 6.3)	No
Other gifts of a value less than £50 (ref: 6.3)	Approval required from Head of Department/Chief Executive/Chairman of the Board as appropriate
Gifts of a value greater than £50 (ref: 6.3)	Cannot be accepted
Lottery tickets, cash, gift vouchers or gift cheques (ref: 6.3)	Cannot be accepted
Trade, loyalty or discount cards (ref: 6.4)	Cannot be accepted
Modest conventional hospitality eg working lunch (ref: 6.8)	No
More formal lunch or dinner by prior invitation (ref: 6.9)	Prior approval required from Head of Department/Chief Executive/Chairman of the Board as appropriate
Hospitality for a team (ref: 6.9)	Prior approval required from Head of Department/Chief Executive/Chairman of the Board as appropriate
Commemorative or similar occasion organised by a contractor, consultant or supplier (eg to celebrate an anniversary, opening or handover) (ref: 6.8)	Prior approval required from Head of Department/Chief Executive/Chairman of the Board as appropriate

Trade promotion on company's premises with meals or drinks (ref: 6.8)	Prior approval required from Head of Department/Chief Executive/Chairman of the Board as appropriate
Annual dinner of professional institute or association where the officer is <ul style="list-style-type: none"> • A guest of the institution or association • A guest of a particular consultant, contractor or supplier (ref: 6.8) 	Prior approval required from Head of Department/Chief Executive/Chairman of the Board as appropriate
Overseas visits to inspect manufacturers products or premises (ref 6.8)	Prior approval required from Chief Executive/Chairman of the Board
Invitation to supporting expensive social functions where there is no direct link to official business	Cannot be accepted
Gifts received in recognition of work done (ref: 6.6)	Acceptance dependent on whether done in NIMDTA time and with NIMDTA resources. Prior approval required from Head of Department/Chief Executive/Chairman of the Board as appropriate
Form A1: Gifts and Hospitality Approval Form and Gift and Hospitality Register must be completed on all occasions	
Examples where hospitality may not be accepted (not a prescriptive list) Leisure Events / Complimentary Tickets / Sporting Events / Weekend breaks or holidays, whether paid or not / (very occasional acceptance of meals or tickets may be accepted – paragraph 4.8	