

Policy Title	Gift Policy
Issue date (m/y)	09/2011
Author	Laura Cook, Director
Approved by	Donna Welburn
Last review	07/2017
Review date (m/y)	08/2019

Context and /or Aims

The Learning Support Centre Ltd are aware that in the course of your employment there may be occasions where you may provide or receive gifts or hospitality. Employees must be conscious of the potential for the legitimate use of the gift or hospitality to be misinterpreted and this policy aims to prevent any inappropriate behaviour arising. The Learning Support Centre must comply with all applicable laws, regulations, codes and sanctions relating to anti-bribery and anti-corruption including but not limited to the Bribery Act 2010 (“Relevant Requirements”).

Policy Statement

It is important that employees consider carefully the circumstances in which they provide or accept gifts, in order to avoid any suspicion of improper behaviour. If an employee is in any doubt as to whether the acceptance of a particular gift may be a breach of this policy, they should seek advice from their line manager in the first instance. This includes not accepting one product from a 241 deal if shopping with your client. Lending or borrowing of money from/to a client is prohibited. In general if the offer or acceptance of a gift is such that you would be uncomfortable if knowledge of it became widely known, then it may be inappropriate. Employees are advised that alleged breaches of this policy will be investigated under the Disciplinary Procedure.

Requirements for Implementation

Gifts from clients: Employees are required not to solicit any gifts, reward or advantage while on The Learning Support Centre Ltd business, under any circumstances.

Guidelines on the acceptance of gifts are as follows:

Gifts for personal use: The Learning Support Centre Ltd do not encourage the acceptance of gifts from clients or their relations. However, there may be occasions where token gifts are given to staff, such as a box of chocolates, in appreciation of the support given during their studies. Employees may accept such gifts, but must declare all gifts received to their line manager.

If a client offers or delivers a gift to an employee, which could be misinterpreted, they must politely refuse and return the gift immediately to the sender, explaining The Learning Support Centre Ltd policy on gifts as the reason.

Approval required and value: Notwithstanding the above, any gift in excess of £10 must be declared to the Operations Director or Managing Director for approval.

Bribery Act 2010

The Learning Support Centre must comply with all applicable laws, regulations, codes and sanctions relating to anti-bribery and anti-corruption including but not limited to the Bribery Act 2010 (“Relevant Requirements”).

All Learning Support Centre, employees, volunteers or subcontractors must not do, or omit to do, any act that will cause or lead The Learning Support Centre to be in breach of any of the Relevant Requirements.

Related Documents

Disciplinary Policy and Procedure

Bribery Act 2010 Guidance

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