

Gifts and Hospitality Policy

Version: 1.0

Status	Approved
Policy Owner	Governance Team
Applicable to	This policy applies to: • GDC employees • Council Members • Others who work with the GDC, including our Independent Governance Associates and wider Associates groups, interns, volunteers, secondees, and casual workers.

Approving forum (tick all that apply)	☐ Chief Executive/Registrar/Accounting Officer ☐ ELT ☐ Senior Management Team (SMT) ☐ Head of Function ☐ Senior Information Risk Owner	☒ Audit & Risk Committee ☐ Finance & Performance Committee ☐ Remuneration & Nomination Committee ☐ Statutory Panellists Assurance Committee ☐ Council
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Next review due by: 19/05/2027

1. Introduction

- 1.1. In the course of our work, there may be occasions where gifts or hospitality are offered. It is essential to maintain public trust and confidence in the GDC and all individuals associated with it. This policy provides guidance on what to do in circumstances where gifts or hospitality are offered to ensure that we meet the highest standards of integrity.
- 1.2. Under the Bribery Act 2010, it is a criminal offence for employees in an official capacity to accept any gift or consideration as an inducement or reward for:
 - Doing or not doing anything; or
 - Showing favour or disfavour to any person.
- 1.3. Organisations can also be prosecuted if bribery is disguised through frequent or 'lavish' gift giving. This policy is designed to make clear the expectations that the GDC has about how gifts and hospitality will be treated.
- 1.4. This policy applies to GDC employees, Council Members and others who work with us. This will include our Independent Governance Associates, wider Associates group, interns, volunteers, secondees, and casual workers.
- 1.5. The policy and its accompanying appendices are designed to provide guidance as to:
 - What is and is not acceptable in relation to the acceptance of gifts or hospitality
 - How and when a declaration in relation to gifts or hospitality should be made
 - How to raise a concern in relation to an offer of gifts or hospitality; and
 - How declared declarations of gifts and hospitality will be recorded, reviewed and monitored.

2. Principles

- 2.1. You must not accept gifts and hospitality or receive other benefits from anyone which might reasonably be seen to compromise your personal judgement or integrity.
- 2.2. Making appropriate declarations, in relation to actual or potential conflicts of interest, is vital given the role you play in administering the GDC's statutory functions.
- 2.3. The following principles apply when considering whether or not to accept a gift or hospitality:
 - All offers of gifts or hospitality must be declared.
 - Responsibility for making the declaration of any offer of gift or hospitality lies with you, the individual in receipt of the offer.
 - Any gift or hospitality you accept must be justifiable. By this we mean that it is in the direct interest of furthering the key purposes of the GDC and it must be proportionate to that interest.
 - When considering whether or not to accept an offer of a gift or hospitality, you must consider whether the acceptance would stand up to public scrutiny.

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- The frequency and generosity of an offer of a gift or hospitality must also be considered when assessing whether or not to accept it. Accepting gifts or hospitality frequently from the same individuals or organisations might give rise to the perception that the work of the GDC is being influenced by the objectives of the external party and could damage our reputation.
 - Gifts or hospitality offered to a connected person (a person with whom you have a personal or business relationship with), as a result of your role with the GDC, should also be declared.
 - If you are involved or responsible for procurement or management of contracts, you must adhere to strict rules in relation to your dealings with external suppliers. Purchasing decisions or contract negotiations must be based solely on achieving value for money and in adherence to relevant procurement legislation and best practice. You should not accept gifts or hospitality if this could, or could be seen to, influence those interactions. If you are unsure in relation to this issue, please seek guidance from the Head of Governance in the first instance, who will consult with the In-House Legal Advisory Service and the Procurement team.

3. Gifts

- 3.1. A 'gift' is any benefit, item or service that is given to you free of charge, or at less than its commercial value, by an external party.
- 3.2. All gifts offered must be declared, regardless of whether they are accepted or declined.
- 3.3. Gifts of an estimated value of under £50 may be accepted, if appropriate in line with this policy, but must be declared.
- 3.4. **Examples of gifts under £50 which may be accepted:**
 - Merchandise freely available at a conference, seminar or training event
 - Low value office goods e.g. diaries/pens etc.
 - Chocolates/confectionery/flowers
 - Bottled waters/soft drinks
- 3.5. Any gift of an estimated value of £50 or over must be declined, declared and, if already received, returned.
- 3.6. Certain categories of gifts must always be declined, regardless of their estimated value, and must also be declared.
- 3.7. **Examples of gifts which must be declined:**
 - Cash or cash equivalent, such as tickets, gift cards or tokens
 - Alcohol or gifts which contain alcohol
 - Gifts which a third party may reasonably perceive to be excessive or extravagant e.g. designer items, high-end electronics such as phones and tablets or VIP tickets to major sporting events or concerts
 - Where acceptance would break laws, regulations or GDC policies or be inconsistent with our values

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- Discounts on private purchases from suppliers with whom we have official dealings e.g. IT equipment, furniture and stationery
 - Gifts when there is a pending or open procurement exercise
- 3.8. Under no circumstances should gifts be solicited. If you receive an unsolicited gift which ought to be returned under this policy but, because it was sent anonymously cannot be, you must:
- Declare the gift
 - If the gift is estimated to be valued at more than £50 or is estimated to be valued at less than £50 but falls within the examples above of gifts which must be declined, please consult the Governance team (governance@gdc-uk.org).
- 3.9. Gifts estimated to be valued at more than £50 will be donated to an appropriate charity. Gifts that contain alcohol will be disposed of.
- 3.10. For completeness, GDC funds must not be used to give gifts to others (whether internal or external to the organisation). Given our obligations to ensure GDC finances are spent appropriately, if GDC staff wish to give gifts to internal colleagues (whether as leaving gifts, celebration gifts or gifts given in sympathy due to loss or bereavement), this is both welcome and positive for our culture but it is important that the costs are borne by a collection from relevant colleagues who wish to contribute.

4. Hospitality

- 4.1. 'Hospitality' is food, drink or other privileges provided by an external party to you. This may include meals or refreshments, offered as part of attendance at a meeting, reception or other event, or offers of free travel and/or accommodation to attend such events.
- 4.2. It is recognised that you are expected to build and maintain effective networks with external stakeholders, to support our work, and to gain an understanding of views of those stakeholders about our key purpose of protecting the public and promoting public confidence in the profession.
- 4.3. These networking opportunities may come with offers of hospitality which could, on occasion, further the key purposes of the organisation and therefore can under certain circumstances be accepted. This must be balanced against upholding high standards of propriety and guarding against the appearance of a real or perceived conflict of interest or the creation of an undue obligation.
- 4.4. A 'conflict of interest' is a set of circumstances that creates a risk that an individual's ability to apply judgement or act in a role is, or could be, impaired or influenced by a secondary interest. The perception of competing interests, impaired judgement or undue influence can also be considered a conflict.
- 4.5. All offers of hospitality must be declared, whether they are accepted or declined, and regardless of value.
- 4.6. **Examples of hospitality which may be accepted:**
- Meals or refreshments offered as part of attendance at a meeting, reception or other event – must be incidental to the legitimate business event and the best use of time
 - Tea/coffee/soft drinks during working meetings
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- Travel and overnight accommodation

4.7. Certain types of hospitality must always be declined and declared, regardless of their estimated value.

4.8. **Examples of hospitality which must be declined:**

- Alcohol during normal business hours, at meetings, seminars or training events
- Invitations to events where alcohol is the central theme
- Invitations from suppliers or potential suppliers to sporting, social or cultural events, or hospitality at such events
- Where hospitality is, or could be perceived to be, excessive or extravagant
- From organisations where there is a direct (or perceived) involvement or connection with a GDC related bid, tender, contract renewal, ongoing negotiation or decision
- Where a reasonable member of the public would consider the hospitality to not be reasonable, appropriate and/or proportionate
- Where acceptance would break laws, regulations, GDC policies or be inconsistent with our values.

4.9. Where hospitality is offered to you in relation to a role you hold outside of the GDC, you must consider whether the offer could be perceived to be in relation to your position within the GDC before accepting.

6. Declaring Gifts and Hospitality

6.1. The process for declaring Gifts and Hospitality is set out as follows:

- The process for declaring gifts and hospitality for GDC Council Members and Independent Governance Associates can be found at **Appendix 1**.
- The process for declaring gifts and hospitality for GDC Associates can be found at **Appendix 2**.
- The process for declaring gifts and hospitality for GDC Staff (including ELT) can be found at **Appendix 3**.

7. Equality, Diversity and Inclusion

7.1. As part of the development of this policy and its accompanying appendices, its impact on Equality, Diversity and Inclusion has been assessed.

7.2. The assessment is to minimise and, if possible, remove any disproportionate impact on the grounds of age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex, or sexual orientation. No detriment was identified.

8. Related policies

- 8.1. Anti-Fraud, Bribery and Corruption Policy
- 8.2. Managing Interests Policy
- 8.3. Whistleblowing Policy

9. Monitoring and review

- 9.1. This policy will be reviewed every two years by the Governance team with input from People Services. Any substantive amendments will be proposed to the ARC for approval. Minor amendments may be implemented by the Head of Governance as outlined below.
- 9.2. Any updates to this policy will be made available to relevant stakeholders and included in the Governance Manual and Governance Handbook.

10. Appendices

- 10.1. Appendix 1 – Process for declaring gifts and hospitality for GDC Council Members and IGAs ('Members')
- 10.2. Appendix 2 – Process for declaring gifts and hospitality for GDC Associates ('Associates')
- 10.3. Appendix 3 – Process for declaring gifts and hospitality for GDC Staff (including ELT) ('Staff')
- 10.4. Appendix 4 – Gifts and Hospitality Declaration Form

Minor Changes – approved by Head of Governance	Significant Changes – approved by ARC
Correction of spelling errors or typos Changes to layout Change of policy owner Updates to links and external references Addition of definitions Addition of external links	Changes to who the policy applies to Change to approving forum, particularly if moving “down” a tier (e.g. ARC to ELT) Changes to the scope Change to the substance of the policy Changes to procedure/process Changes to roles or responsibilities within the policy

Date of Review	Type of Review	Approval Forum	Version Number

Appendix 1 – Process for declaring gifts and hospitality for GDC Council Members and Independent Governance Associates

1. Scope

- 1.1. This process applies to members of the GDC Council and Independent Governance Associates (IGAs) of the GDC. This includes the independent members of the Statutory Panellists Assurance Committee and the independent members of the non-statutory Committees of the Council. Hereafter referred to as Members.

2. Making a Declaration

- 2.1. Upon receipt of an offer of a gift or hospitality, Members should:
 - Review the Gifts and Hospitality policy to ascertain whether or not it should be accepted or declined.
 - If in any doubt about whether or not it would be appropriate to receive a gift, or whether to accept an offer of hospitality, seek advice from the Head of Governance (governance@gdc-uk.org).
- 2.2. Regardless of whether or not you intend to accept or decline the gift or hospitality, if the offer is, or could reasonably be perceived to be, made in relation to the Member's GDC position, it should be declared.
- 2.3. Where an offer of a gift or hospitality is declined, this should be communicated in writing, either by email or letter, to the person or organisation making the offer. All such communications should be copied to the Governance team at governance@gdc-uk.org to allow all declined invitations and offers to be recorded. This information may be required for audit purposes.
- 2.4. If there is a dispute, following liaison with the Governance team, as to how an offer of a gift or hospitality should be managed, the matter will be referred to the Chair of the Council (or Chair of the Audit and Risk Committee in respect of the Chair of the Council), whose decision will be final.

3. Declaring Gifts and Hospitality

- 3.1. All Members are expected to act and be seen to act impartially and objectively in carrying out their roles.
- 3.2. Council Members are responsible for disclosing any offers of gifts and hospitality, as and when they arise¹, and at least every **6 months**.

¹ Within 10 working days

- 3.3. IGAs are responsible for disclosing any offers of gifts and hospitality, as and when they arise,² and at least every **12 months**.
- 3.4. New Members will receive a copy of this policy in their appointment pack.
- 3.5. Declarations should be made using the attached form (**see Appendix 4**) and returned to the Governance team at governance@gdc-uk.org.
- 3.6. The Governance team will send a bi-annual reminder to Council Members and an annual reminder to IGAs to make their declarations.
- 3.7. The Governance team will send the declarations to the relevant parties for review. Member declarations will be reviewed by the appropriate individual (as outlined in the table below) and if any declarations of gifts or hospitality present concerns for those reviewing them, action will be taken in line with the Members' Code of Conduct and the obligations and duties set out within the Member's agreement. Non-compliance with this policy will be dealt with similarly.

Member Type	Reviewer
Council Member (excluding Chair)	Chair of Council
IGA - Non-Statutory Committee	Chair of Council
SPC Chair	Chair of Council
Chair of Council	Senior Independent Council Member
IGA - SPC	Chair of SPC

- 3.8. If you have concerns that a Member may have breached this policy, you should discuss this concern with the Head of Governance in the first instance. The Head of Governance may consult the Executive Director, Legal and Governance, Chief Executive, Chair of the Council or Chair of the Audit and Risk Committee (as appropriate). You can also refer to the Whistleblowing policy for further guidance in relation to raising concerns.

² Within 10 working days

4. Monitoring Declarations

- 4.1. The Governance Team will record, maintain and publish (as appropriate) the declarations of gifts and hospitality received from Council Members and IGAs via a central register. Declarations will be retained internally for 10 years in accordance with the GDC's retention schedule.
- 4.2. Council Members and IGA's Gift and Hospitality declarations will be published on the GDC website.
- 4.3. The Governance team will also maintain a record of all requests for advice and guidance on this policy to establish trends and to assist when this policy is due for review. The Audit and Risk Committee will receive an annual report (or exception reporting if required) of all declarations of gifts and hospitality in respect of Council Members and IGAs.

Appendix 2 – Process for declaring gifts and hospitality for GDC Associates

1. Scope

1.1. This process applies to Associates of the GDC, hereafter referred to as **Associates**. This includes, but is not limited to:

- Statutory Committee members (such as Fitness to Practise panellists or Registration Appeal panellists)
- Education Associates (Education Visitors/Quality Assurance Inspectors)
- Dental Complaints Service Panellists
- Members of the Overseas Registration Examination (ORE) Advisory Group
- ORE External Examiners
- External Clinical Advisers
- External Clinical Experts; and
- Fitness to Practise Professional and Legal Advisers

2. Making a Declaration

2.1. If you are offered any gift or hospitality, you should:

- Review the Gifts and Hospitality policy to ascertain whether or not you should accept or decline it.
- Seek advice if you are in any doubt about whether or not it would be appropriate to receive a gift, or whether to accept any offer of hospitality, should seek advice from a Senior People Partner or the staff owner for your Associate position.

2.2. Regardless of whether or not you intend to accept or decline the gift or hospitality, if the offer is, or could reasonably be perceived to be, made in relation to the Associate's GDC position, it should be declared.

2.3. Where an offer of a gift or hospitality is declined, this should be communicated in writing, either by email or letter, to the person or organisation making the offer. All such communications should be copied to People Services (peopleservices@gdc-uk.org) to allow all declined invitations and offers to be recorded. This information may be required for audit purposes.

2.4. For Associates, if there is a dispute, following liaison with People Services, as to how an offer of a gift or hospitality should be managed, advice should be sought from the Governance team and the matter should be referred to the relevant Member of the Executive team for the Directorate to which the Associate is attached. Their decision will be final.

3. Declaring Gifts and Hospitality

- 3.1. All Associates are expected to act and be seen to act impartially and objectively in carrying out their roles.
- 3.2. Associates are responsible for disclosing any offers of gifts and hospitality, as and when they arise³, and at least every **12 months**.
- 3.3. New Associates will be sent a copy of this policy in their appointment pack.
- 3.4. Declarations should be made using the attached form (see **Appendix 4**) and returned to People Services at AssociatesDeclarations@gdc-uk.org.
- 3.5. People Services will send an annual reminder to all Associates to make their declarations.
- 3.6. People Services will send the declarations to the relevant parties for review.
- 3.7. The staff owners for Associates will review their declarations in the first instance and escalate any declarations that cause concern to a Senior People Partner.
- 3.8. When Associate declarations are made, they will be reviewed by People Services and, if any declarations of gifts or hospitality present concerns for those reviewing them, action will be taken in line with the Code of Conduct and the obligations and duties set out within the Associate's agreement. Non-compliance with this policy will be dealt with similarly.
- 3.9. If you have concerns that an Associate may have breached this policy, you should discuss this concern with the relevant member of the Executive team to which the Associate is attached. They may consult with the Head of Governance, Executive Director, Legal and Governance, Chair of the Council or Chair of the Audit and Risk Committee (as appropriate). You can also refer to the Whistleblowing policy for further guidance in relation to raising concerns.

4. Monitoring Declarations

- 4.1. People Services will record and maintain the declarations of gifts and hospitality received from Associates via a central register and will be shared with the Governance team for annual reporting purposes. Declarations will be retained internally for 10 years in accordance with the GDC's retention schedule.
- 4.2. Associates' Gift and Hospitality declarations will be collated and stored centrally by People Services but not published on the GDC website or elsewhere.

³ Within 10 working days

- 4.3. People Services will also maintain a record of all requests for advice and guidance on this policy to establish trends and to assist when this policy is due for review.
- 4.4. The Audit and Risk Committee will receive an annual report (or exception reporting if required) of all declarations of gifts and hospitality in respect of GDC Associates. The Governance team will produce the report with support and provision of data from People Services.

Appendix 3 – Process for declaring gifts and hospitality for GDC Staff (including ELT)

1. Scope

- 1.1. This process applies to GDC Staff. This includes the Chief Executive, Chief Operating Officer, Executive Directors and all GDC employees, including interims, secondees, temporary staff and those on fixed term contracts, hereafter referred to as Staff.

2. Making a Declaration

- 2.1. If you receive an offer of a gift or hospitality, you should:
- Review the Gifts and Hospitality policy to ascertain whether or not you should accept or decline it.
 - Seek advice if you are in any doubt:
 - Staff in doubt about whether or not it would be appropriate to receive a gift, or whether to accept an offer of hospitality, should seek advice from their line manager. Staff will need pre-approval from their line manager if they want to accept any gift or hospitality.
 - Line managers should review any requests to accept gifts or hospitality in line with this policy and, if unsure as to whether to approve them, seek guidance from their relevant Member of the Executive team who may also speak to the Head of Governance for advice.
 - Members of the Executive team can seek advice from the Head of Governance, Executive Director, Legal and Governance or Chief Executive.
- 2.2. Regardless of whether or not you intend to accept or decline the gift or hospitality, if the offer is, or could reasonably be expected to be, made in relation to a member of Staff's GDC position, it should be declared.
- 2.3. Where an offer of a gift or hospitality is declined, this should be communicated in writing, either by email or letter, to the person or organisation making the offer. All such communications should be copied to People Services (peopleservices@gdc-uk.org) to allow all declined invitations and offers to be recorded. This information may be required for audit purposes.
- 2.4. For Staff (including ELT Members), if there is a dispute, following liaison with People Services, as to how an offer of a gift or hospitality should be managed, the matter should be referred to the Chief Executive, whose decision will be final.
- 2.5. In the case of the Chief Executive, if there is a dispute, following liaison with People Services, as to how an offer of a gift or hospitality should be managed, the matter should be referred to the Chair of the Council, whose decision will be final.

3. Declaring Gifts and Hospitality

3.1. All Staff are expected to act and be seen to act impartially and objectively in carrying out their roles.

3.2. All new members of Staff will be sent a copy of this policy by People Services with their induction documentation

ELT Members

3.3. All ELT Members are responsible for disclosing any offers of gifts and hospitality, as and when they arise⁴, and at least every **six months**.

3.4. ELT Members should make declarations using the attached form (**see Appendix 4**) and return to the Governance team at governance@gdc-uk.org.

3.5. The Governance team will send a bi-annual reminder to ELT members to make their declarations.

3.6. The Governance team will send the declarations to the relevant parties for review.

3.7. The Chief Executive will review declarations for all ELT Members.

3.8. The Chair of the Council will review declarations for the Chief Executive.

3.9. The Governance team will keep a central register of ELT declarations.

Wider GDC Staff Group

3.10. All other GDC Staff are responsible for disclosing any offers of gifts or hospitality, as and when they arise⁵, and at least every **12 months**.

3.11. All other Staff should make declarations using the [online Gifts and Hospitality Declaration form](#), which can also be found on the GDC's intranet page.

3.12. Upon submission of the online form, the member of Staff's line manager will be alerted to review any declarations submitted.

3.13. People Services will send an annual reminder to Staff to make their declarations.

3.14. When all other Staff declarations are made, they will be reviewed by the member of staff's line manager and, if any declarations of gifts or hospitality present concerns for those reviewing them, action could be taken in line with the GDC's disciplinary procedures

⁴ Within 10 working days

⁵ Within 10 working days

and the obligations and duties set out within a member of Staff's contract of employment. Non-compliance with this policy will be dealt with similarly.

- 3.15. If you have concerns that a member of Staff may have breached this policy, you should discuss this concern with Head of Governance in the first instance. The Head of Governance may consult with the Executive Director, Legal and Governance, Chief Executive, Chair of the Council or Chair of the Audit and Risk Committee (as appropriate). You can also refer to the Whistleblowing policy for further guidance in relation to raising concerns.

4. Monitoring Declarations

- 4.1. The Governance team will record, maintain and publish (as appropriate) the declarations of gifts and hospitality received from ELT Members.
- 4.2. People Services will record and maintain the declarations of gifts and hospitality received from the wider GDC Staff group via a central register and will be shared with the Governance team for annual reporting purposes.
- 4.3. Declarations will be retained internally for 10 years in accordance with the GDC's retention schedule.
- 4.4. ELT Members' Gift and Hospitality declarations will be published on the GDC website.
- 4.5. All other Staff Gift and Hospitality declarations will be collated and stored centrally by People Services but not published on the GDC website or elsewhere.
- 4.6. The Governance Team and People Services will also maintain a record of all requests for advice and guidance on this policy to establish trends and to assist when this policy is due for review.
- 4.7. The Audit and Risk Committee will receive an annual report (or exception reporting if required) of all declarations of gifts and hospitality in respect of ELT Members.
- 4.8. The ELT Board will receive an annual report (or exception reporting if required) of all declarations of gifts and hospitality in respect of all other Staff. The Governance team will produce the report with support and provision of data from People Services.

Declaration of gifts and hospitality

Name:

Position:

Period:

Nature and description of gifts and hospitality (including venue if applicable)	Value	Reason for gift/hospitality and whether it was accepted or not	Approved by Director/CEO/Chair

This signature is to confirm that they have reviewed the declaration. Any concerns should generally be raised in accordance with the GDC's Gifts and Hospitality policy.

Processing your personal data is necessary for the exercise of the GDC's statutory functions. More information about your data protection rights and how long we will keep your information for can be found in the privacy notice on our website at www.gdc-uk.org/privacy.