Gifts and Hospitality Policy

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Contents

DOCUMENT CONTROL

The Director of Finance is the owner of this document and is responsible for ensuring its distribution. The document will be reviewed/updated biennially or sooner if required.

DOCUMENT INFORMATION

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CHANGE HISTORY

Ver. No.	**Ver. Date**	**Description**	**Reviewer**	**Status**
2.0	21/08/25	Previous versions included as part of the Finance Manual – now extracted as a separate policy	Director of Finance and Finance Manager	Final
2.1	29/04/26	Inclusion of the Policy note for CEO when travelling abroad and changes to approvals to reflect new SLT structure	Director of Finance and Finance Manager	Final

DISTRIBUTION

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1 Overview

This guidance was previously included as part of the SIB Finance Manual. It has been updated and developed as a standalone document.

This guidance relates to the offer and acceptance of gifts and hospitality both to and from SIB staff. It is issued in accordance with, and should be read alongside, the guidance detailed below. This guidance is designed to protect both individual members of staff and SIB in general. External people acting for or incurring costs on behalf of SIB (e.g. consultants, contracted staff etc.) must also adhere by the principles of guidance and should be notified of this requirement before commencing work in SIB. If it is believed that an external person may have breached the policy, the matter should be reported to the Director of Finance, who will take the matter forward with the individual or his/her company.

The following guidance is also available:

- Dear Accounting Officer Letter, DAO (DFP) 10/06 – Acceptance and Provision of Gifts and Hospitality.
- DoF 2024-0064 - Guidance on the Acceptance and Provision of Gifts and Hospitality
- The SIB Staff Handbook.
- SIB's Guidance on Conflicts of Interest
- Dear Accounting Officer Letter, DAO (DFP) 09/11 – Bribery Act 2010. Staff should be aware of this guidance, DAO (DFP) 09/11, in the context of the provision and receipt of gifts and hospitality.
- Dear Accounting Officer Letter, DAO (DoF) 07/21 – Conflicts of interest guidance: DAO (DoF) 07/21.
- SIB's Policy and Procedures on Fraud.
- Fraud Act 2006.

2 Purpose

The purpose of this document is to outline:

- the guidelines and fundamental principles to be followed when receiving, and considering the acceptance of, offers of gifts and hospitality from others;
- the guidelines and fundamental principles to be followed when offering gifts and hospitality to others;
- the procedures for authorising, reporting and monitoring offers of gifts and hospitality; and
- the roles and responsibilities of all staff in relation to gifts and hospitality.

3 Scope

This guidance applies to gifts and hospitality offered to or by all SIB staff. It should also be taken to apply to gifts and hospitality offered to spouses, partners or other associates of a staff member if it could be perceived that the offers are in fact designed for the benefit of the staff member. Examples of other associates may include close relatives, business colleagues or a person with whom a member of staff has social contact.

This guidance does not supply an exhaustive list of the types of gifts and hospitality which can be accepted or provided in all situations. Rather, it provides an ethical framework for decision making and outlines the approvals required and reporting processes which should be followed by all staff.

4 Fundamental Principles

The SIB Staff Handbook indicates that staff should conduct themselves with honesty and impartiality in the exercise of their duties. Staff should never receive benefits of any kind from a third party which might reasonably be thought to compromise their personal judgement, integrity or impartiality. In this field, perception is as important as reality.

The fundamental principle is that no member of staff should do anything that may give the impression to their colleagues, members of the public, or people with whom they have to deal in an official capacity, that they have been, or may have been, influenced by a gift or hospitality or other consideration to show bias either for or against any person or organisation while carrying out their official duties. A useful test when considering whether any course of action, including the acceptance or provision of a gift or hospitality, meets the requirements of propriety is to ask: '**could this course of action be satisfactorily defended in public?'**

5 Situations Not Covered by the Hospitality Guidelines

It is recognised that there may be exceptional cases where, in the interest of SIB, flexibility in interpretation of the strict rules on the acceptance or provision of hospitality or gifts may be necessary. In such instances, approval must be obtained in writing from the Finance Director or the CEO (depending on circumstances), which clearly details:

- Why the request falls outside the boundaries of what is normally allowable;
- Why it is considered necessary to provide or receive such hospitality (or a gift);
- How it will directly benefit SIB; and

- The expected consequences of the request being refused.

In the case of the Chief Executive being the recipient or provider of the hospitality/gift excepted under the above, he must obtain written approval from the Chairman of the SIB Board.

In all cases, the Executive Office (TEO) must also be informed by way of a copy of the written approval.

The written approval must be passed to Finance and saved together with any related invoice or receipts.

The Gifts and Hospitality Register must also be updated to reflect the details and approvals.

6 Legal Obligations

Under the Prevention of Corruption Acts of 1906 and 1916 it is an offence for an officer in their official capacity to:

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

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

The UK Bribery Act 2010 permits the provision and receipt of gifts and hospitality provided they are **proportionate and reasonable**. Gifts or hospitality which are demonstrably disproportionate or unreasonable may be construed as bribes and thus unlawful. The offer or receipt of payments or goods to speed up an existing task or duty which would otherwise be carried out anyway, referred to as 'facilitation payments' under the Act, is also considered bribery and is thus unlawful.

Therefore, a breach of the rules of conduct on gifts and hospitality can not only lead to disciplinary action, but can also be a criminal offence.

7 Gifts and Hospitality Offered to SIB Staff

7.1 INTRODUCTION

Guidance (applicable to SIB) on the acceptance of gifts and hospitality is contained in DAO (DoF) 10/06. This guidance outlines:

- the kinds of instances when gifts and hospitality can and cannot be reasonably accepted;
- the processes which should be followed to gain approval to accept gifts and hospitality; and
- the processes which should be followed to report gifts and hospitality offers (both accepted and refused) on Gifts and Hospitality Registers.

SIB recognises that contractors and other customers of our services may extend from time to time offers of gifts and hospitality to staff. SIB also recognises that its employees have a responsibility, in the interests of public confidence, to exhibit high standards of propriety, and carry out their role with dedication and a commitment to the organisation and its core values: integrity, honesty, objectivity and impartiality.

The SIB handbook indicates that staff members should conduct themselves with honesty and impartiality in the exercise of their duties. As a consequence, they should never receive benefits of any kind from a third party which might reasonably be thought to compromise their personal judgement or integrity. In this field, perception is as important as reality.

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

External people acting on behalf of the SIB (for example, consultants, contracted staff etc.) must also abide by the policy. If it is believed that an external person may have breached the policy, the matter should be reported to the Chief Executive Officer, who will take the matter forward with the individual or his/her company. This requirement should be notified to external staff before they start work within SIB.

This guidance should also be seen as applying to spouses, partners or other associates if it can be argued or perceived that the gift or hospitality is in fact for the benefit of the official.

Any breach of the rules of conduct can lead to disciplinary action and in some circumstances can be a criminal offence. This Guidance focuses on the key issues and the specific rules applicable to SIB staff.

A quick reference guide for offers of Gifts/Hospitality made to SIB staff can be found in Annex E.

7.2 GIFTS AND HOSPITALITY REGISTER

Whether accepted or rejected, all gifts and invitations for hospitality, other than infrequent working lunches must be recorded in the **Gifts and Hospitality Register**.

This Register is maintained by the Information and Compliance Manager. And entry must be made on Gifts and Hospitality Register on **all** occasions when an offer of a gift or hospitality is made by an external individual or organisation. They should contain details of gifts and hospitality declined as well as accepted.

These Registers must include, for each entry:

- the date the gift or hospitality was offered;
- the date of the event;
- who it was offered to;
- the ultimate recipient (if different);
- the organisation or individual making the offer;
- a description of the offer;
- the reason for the offer;
- details of contracts – current or potential;
- details of any relationship with the offerer;
- the estimated or actual value of the offer;
- action taken (accepted, refused, etc.) and the reason;
- who made the entry on the Register;
- the date the entry was made; and
- where necessary, a CM ref to the completed approval form.

New offers of gifts and hospitality should, where necessary, be reported on the Registers **as soon as possible** after decisions have been made regarding their acceptance or refusal, whether they fall into that reporting period or not. For instance if staff receive offers in 2025-26 to attend events in 2026-27, those offers should be recorded in the 2025-26 register. The registers should provide a complete picture of all **offers** made during that financial year. All Registers and accompanying approval forms should be maintained in CM.

It is the responsibility of all staff to ensure they follow the approval and reporting procedures outlined in this policy.

Individuals and/or teams should report all offers of gifts and hospitality on the pro-forma attached at Annex A to ensure information is recorded across SIB in a consistent manner and to provide an adequate audit trail. If an offer requires approval, please complete the form (Annex B) and submit to Finance. Copies of completed approvals should be retained by Finance and will form part of the Register.

It is recognised that in some cases the value of hospitality received is not readily apparent. Staff are expected to exercise careful judgement when determining approximate values for reporting purposes, informed where necessary by market research to establish the price of similar items/hospitality. The following estimated values should be used to ensure consistency across SIB, where no readily available market price can be determined:

Description	Value (£)
Dinners (including formal black-tie dinners) *	60
Formal Lunch (e.g. Professional Institute)	40
Casual Working Lunch	25
Breakfast / Buffet / Refreshment / Drinks Reception	20

* The £60 value is intended to cover the black-tie dinner only. If hospitality is provided at an event where specific entertainment is provided alongside the meal, consideration should be given to attributing a higher value to this form of hospitality.

The following types of gifts and hospitality are the **only** types which **do not** normally need to be reported on Registers:

- 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; and
- conventional hospitality, unless it is deemed to be unduly frequent or inappropriate in some other way.

The registers are subject to Freedom of Information disclosures and therefore need to be complete and up to date at all times.

The SIB Gifts and Hospitality Register will be published on the SIB website on an annual basis.

7.3 ACCEPTANCE OF GIFTS

The general principle is that 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 approved in advance or reported in the gifts and hospitality register. Acceptance of any other gift must have been approved by the staff member's respective SLT member in advance and must be declared by the member of staff in the register.

All other gifts, including token gifts which are under £50 but which do not bear the company logo, must be reported on the register whether accepted or declined. If the gift is accepted, the register should note why it was not possible/practical to follow the general principle of refusing/returning all gifts.

More expensive or substantial items, **valued at £50 or more** and gifts of lottery tickets, cash, gift vouchers, gift cheques, alcohol, cigarettes and cigars **cannot on any account be accepted and retained by the individual.**

All gifts offered (apart from those which are trivial or inexpensive as noted above), even if they are declined/returned, need to be recorded in the gifts and hospitality register. Approval to accept gifts is required from the staff member's respective SLT member. In each case the approver must indicate in writing, with reasons whether the gift is to be:

- retained by the recipient;
- returned to the donor with a suitably worded letter explaining why the gift cannot be accepted;
- used, if possible, in the organisation or;
- donated to a nominated charity.

The approver should ensure that the item is included within the hospitality register and the written decision should be retained and referenced in the register as back up to the summary hospitality register.

7.4 TRADE, LOYALTY OR DISCOUNT CARDS

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

7.5 STAFF INVOLVED IN THE PROCUREMENT OR MONITORING OF A CONTRACT

Apart from trivial/inexpensive seasonal gifts, such as diaries or calendars, no gifts or hospitality of any kind from any source directly or indirectly associated with a contract should be accepted by anyone involved in the procurement or monitoring of that contract. This will ensure that no criticism can be made regarding bias to a particular company or supplier.

7.6 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 for the event was done in the officer's own time, how much in official time and the extent to which SIB resources, other than, for example, use of an officially issued laptop at home, were used in the preparation.

The following guidelines should be applied:

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 SIB, it would be acceptable for the individual officer to retain the whole fee, token or other gift;

B) If, however, the preparation was done wholly in SIB time with use of SIB 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; and

C) If the preparation was carried out and the lecture etc, delivered in a staff members own time but SIB facilities were used for typing, preparation of PowerPoint / overheads etc, then a gift or token to the value of not more than £75 is acceptable.

In the case of either "B", or "C", SIB can, if they so choose, charge the organisation or body 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.

Staff should also be aware of SIB's Guidance on Conflicts of Interest, in this context.

7.7 REPORTING GIFTS AND APPROVAL PROCESS

If gifts (apart from those trivial or inexpensive gifts for which approval is not required) are received, the approval of the staff member's respective SLT member should be sought using the form that is attached at Annex B.

In each case submitted, the approving officer will decide in writing or email, whether to:

- Allow the recipient to keep the gift;
- Return the gift to the donor with a suitably worded letter explaining why the gift cannot be accepted (see Annex C for suggested text to use to decline a gift or offer of hospitality);
- Use or dispose of it, if possible, in or by SIB; or
- Donate the gift to a nominated Charity.

The approving officer will ensure that the details of the case and their decision is recorded in the Gifts and Hospitality Register.

In exceptional circumstances, where refusal of a gift would offend the donor, cause embarrassment or appear discourteous, details of the gift and the circumstances should be provided to the Director of Finance or the CEO who will make a recommendation as to whether the gift should be accepted, and any conditions that should be applied (for example, whether the gift should be used within SIB, a reciprocal gesture made etc.). If a gift is received from abroad, liability to import duty and VAT should be resolved with HMRC.

7.8 OFFERS OF HOSPITALITY

The handling of offers of hospitality is an area in which staff must exercise careful judgement. In all instances, offers should only be accepted when acceptance can be demonstrated to be in the public interest. In deciding whether hospitality can be accepted, staff should consider if acceptance of hospitality:

- 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; and
- provides benefits to SIB which outweigh the risk of possible misrepresentation of the hospitality.

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. To this end, distinctions should also be drawn between "conventional" and "unconventional" hospitality.

DAO (DoF) 10/06 recognises that in exercising this judgement there can be difficulty in distinguishing between a "gift" and "hospitality". The DAO also recognises that it can be as embarrassing to refuse hospitality as it can be to refuse a gift.

Conventional hospitality is modest hospitality provided in the normal course of business, often during morning or afternoon meetings. It can include tea/coffee, biscuits/scones, and modest working lunches. It can normally be accepted by staff provided it is limited to isolated occasions and its acceptance can be demonstrated to be in the interests of SIB.

DAO (DoF) 10/06 notes that it can be argued that if officials are to achieve the best value for money in dealing with suppliers or consultants then they need to build up contacts and it is legitimate for officials to have a close working relationship with organisations or individuals, which may involve a degree of hospitality. There may also be instances where staff receive invitations to events such as Annual Conferences or Dinners run by the private sector, the voluntary and community sector and by professional institutes and other such organisations. Attendance at such events is considered an integral element in building and maintaining relationships with these sectors and such invitations can normally be accepted provided there is a clear link to official business and the hospitality received is likely to be reasonable and proportionate. Types of hospitality which should not normally be accepted include:

- offers of conventional hospitality which are made on an unduly frequent or recurrent basis (e.g. a weekly working lunch);
- invitations to more expensive social functions where there is no direct link to official business (e.g. sporting events, the theatre, ballet, etc.); and
- invitations to events or social functions where the hospitality offered is expected to be extravagant (in such instances officials may consider attending the functions but refusing the hospitality).

Acceptance of tickets to public sporting, cultural or social events, including meals at such events, may be accepted very occasionally and in exceptional circumstances, if attendance is justified as being in the interest of SIB's business. It will be for the staff member to demonstrate clearly that this is the case in the approval forms. Approval must be gained in advance from the staff member's respective SLT member.

7.9 REPORTING HOSPITALITY AND APPROVAL PROCESS TO BE FOLLOWED

When in doubt about accepting hospitality or an invitation the staff member's respective SLT member should be consulted and if further advice is required, the Director of Finance or the Finance Manager should be consulted.

The written approval of the staff member's respective SLT member must be sought in advance using the form which is attached at Annex B before any staff accept hospitality or invitations over £50. The only exceptions to the requirement for prior approval are light refreshments, working lunches on the contact's premises and hospitality worth £50 or less. In all cases, trivial or not, the Gifts and Hospitality Register must be completed.

The CEO and Board members may accept hospitality valued up to £100 without prior approval. For offers above £100, prior approval should be sought from the Chairman of the Board. However, there may be occasions where hospitality exceeding this amount may be offered to the CEO when travelling for business purposes. In this situation, the CEO may use his judgement as to whether or not he should accept the hospitality and ensure it is subsequently reported in the Register upon his return (see Annex G regarding CEO International travel policy).

In each case submitted to them, the approver should decide whether or not to approve the acceptance of the gift or hospitality, clearly indicating the decision and stating the reasons on the approval form. In the case of gifts which have already been received but cannot be accepted in line with this guidance, the approver should indicate whether they are to be returned, disposed of or donated to a nominated charity. The approver must also ensure that the details of the case and their decision are recorded on the approval form.

Approval is not required to refuse the offer of a gift or hospitality. However, staff should be sensitive to the potential for refusals to cause offence and/or harm working relationships. When it is deemed necessary to refuse or return gifts and hospitality offered, it should be done so in a cordial manner and the reasons in relation to Gifts and Hospitality policy should be clearly explained.

If the recipient has rejected, or intends to reject, the offer of hospitality, they only need to include the details in the Gifts and Hospitality Register as the approvals process will not be required.

Finally, it should be emphasized that this guidance is designed to protect both individual members of staff and SIB in general. As the guidance cannot cover every eventuality, the advice of the Finance Director should be sought immediately in case where the propriety of accepting a particular gift or offer of hospitality is in doubt.

It is particularly important to ensure that SIB 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. To guard against the multiple acceptances of invitations to the same event, SIB should make arrangements to ensure that corporate consideration is given to all invitations.

7.10 AWARDS OR PRIZES

Staff should consult with the staff member's respective SLT member if they are offered an award or prize with a monetary value 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 or payment for a publication or invention to which other rules apply.

Where there is any risk of ambiguity, or the potential for public criticism, as to whether or not an award or prize has been offered in respect of official duties or personal achievement, all decisions regarding whether or not the award or prize was offered in respect of official duties should be documented and retained for audit purposes.

The Gifts and Hospitality approval form must be completed and the details noted in the Gifts and Hospitality Register.

8 Provision of Gifts and Hospitality by SIB

8.1 GENERAL

As with all public expenditure, expenditure on gifts and hospitality should represent value for money and be incurred in accordance with the principles of regularity and propriety including Nolan's seven principles of public life. **Any gifts provided or hospitality offered should be in SIB's direct interest and should give no grounds for anyone to reasonably suspect that personal judgement or integrity has been compromised.** To this end and bearing in mind the varied nature of SIB's activities and working patterns, it is recognised that such expenditure may arise more frequently in some areas of SIB than in others. The scale of the hospitality should be proportionate to the needs of the occasion and the status and number of guests. Particular caution should be exercised when considering hospitality for the following:

- visitors for whose time and services SIB is paying (e.g. consultants);
- SIB officials, except when they are attending a meeting or function primarily for non-SIB staff; and
- spouses and partners of SIB staff.

The provision of hospitality should be, and should be seen to be, non-contentious, unostentatious and on a modest scale. It should be limited to food and drink and should not provoke adverse public comment about officials wining and dining at the taxpayers' expense. A quick reference guide for offers of Gifts/Hospitality made by SIB staff can be found in Annex F.

The Gifts and Hospitality policy does not apply to refreshments provided as part of an SIB organised event. All expenditure in relation to events, including event hire and refreshments, must be justified and approved in advance of booking any event.

Hospitality should not be offered for the sole or main purpose of reciprocating hospitality received.

No spouses, partners or guests of SIB staff are eligible to receive hospitality other than in exceptional circumstances and with the specific written agreement of the Chief Executive. In the case where the offer of hospitality has been extended to the spouse, partner or guest of the Chief Executive and Board members, written approval should be obtained from the Chairman of the Board.

8.2 APPROVAL OF EXPENDITURE

If you wish to offer hospitality at a function, you must complete the "Authorisation of Official Hospitality Expenditure" form (Annex D). Full details specifying the purpose of each function, the number of guests and SIB officials attending, together with the itemised costs of food, refreshments, room hire, etc should be shown on the form. Approval must normally be obtained on this form prior to the event taking place. This information must be held with the original invoice in Finance.

The following staff may authorise expenditure on hospitality in advance, as noted below:

- The CEO and Deputy CEO;
- The SLT or Finance Manager up to £1,500;
- Another member of staff delegated by CEO (in writing); and
- Where the CEO is on leave or otherwise away from the office for three days or more, he has delegated the Deputy CEO authority to authorise on his behalf.

Where prior approval is not required by SIB policy staff must still provide full details and justification for the expenditure to SIB Finance. In particular the details should include numbers and names of participants to enable post-event auditing to determine that the SIB policy guidelines were followed.

Official hospitality should be limited within approved budgets.

The following guidelines cover the range of circumstances in which expenditure on hospitality might be expected to arise within SIB.

8.3 OFFICIAL CORPORATE GIFTS

The regulations governing expenditure on official gifts are contained in Annex 4.12 "Gifts" of Managing Public Money Northern Ireland (MPMNI). Official gifts should not be regarded as part of the normal conduct of SIB business and should involve only modest expense.

SIB has a delegated limit from TEO of £100 (inclusive of VAT) in all but exceptional circumstances where the expenditure could be deemed to be novel or contentious. The Chief Executive may therefore approve the purchase of corporate gifts up to the value of £100. For gifts over £100, a case should be made to TEO who will consider the proposal and pursue clearance with DoF Supply.

8.4 HOSPITALITY OFFERED TO VISITORS FROM OUTSIDE SIB

SIB will normally meet expenditure for the provision of lunch/dinner to visitors (including those from other NI and GB Departments) or for a working lunch where a benefit will accrue to SIB or where such an occasion allows for the conduct of urgent business. In such circumstances, expenditure may be incurred without prior approval if kept within the following guidelines:

- Approval should not normally be granted when only NI Civil Servants are in attendance. In cases where those NI Civil Servants attending outnumber external (i.e., non-NI Civil Service) guests, the approval of the Chief Executive Officer should be obtained.
- The number of people invited should be kept to a minimum;
- Any hotels or restaurants used should be appropriate to the purpose. Government establishments should be used wherever possible;
- Any meal should be on a modest scale, with the total cost per head not exceeding £60 and the element for beverages must not exceed 33% of the total bill; prior approval should be obtained for any parties of five or more;
- Where no service charge is included, a tip of 10% is considered reasonable;
- Receipts to cover expenditure must be obtained;
- No spouses or guests of SIB staff are eligible to receive official hospitality other than in exceptional circumstances and with the specific agreement of the Chief Executive; and
- Except where such hospitality constitutes SIB business, SIB funds are not available for visits to theatres or to other forms of public entertainment.

8.5 HOSPITALITY OFFERED BY CEO WHEN TRAVELLING ABROAD

The CEO may travel outside of the UK as part of his role representing SIB. During these business trips, there may be a need for a discretionary spend on hospitality when at events. To ensure transparency, the CEO must seek authorisation in advance of travel from the Chair of the Board to offer hospitality when abroad. This request should include an estimation of spend he may be permitted. See Annex G for the policy note on International travel.

8.6 SIB BOARD AND COMMITTEE MEETINGS

Working lunches, including non-alcoholic refreshments, may be provided for SIB Board meetings and Board Committee meetings under these guidelines. The majority of Board Members attending will not be NI Civil Servants.

8.7 WORKING LUNCHES AND REFRESHMENTS FOR OFFICIAL COMMITTEES AND OTHER AD HOC MEETINGS

The provision of lunch at public expense will be acceptable only where it is impossible to accommodate urgent meetings other than at lunch time and:

- There is a need to make provision for non-NI Civil Service guests;
- It is necessary for participants to remain together during lunch; or
- Pressure of work is likely to be such as to make it impractical to allow a break long enough to give participants reasonable time to obtain lunch elsewhere (although such cases are likely to be rare).

The nature of the lunch should be appropriate to the purpose, with costs kept to a minimum.

If morning or afternoon breaks are warranted, light refreshments tea/coffee/bottled water/biscuits/scones) may be provided, at public expense, at the discretion of the Finance Manager.

8.8 LIGHT REFRESHMENTS

In the course of their work SIB officials may host meetings with civil servants, NDPBs and Cross Border Bodies; other departments; other public bodies; civil servants representing NIPSA and/or other trade unions; and the private and voluntary sectors. Apart from the provision of tea/coffee for one-to-one meetings there should not normally be a charge on public funds unless two or more attendees are not SIB employees.

The Chair of any such meeting should consider whether the circumstances warrant the provision of refreshments. For example, such provision may not be appropriate if a meeting is not expected to last long or if the number of SIB officials far outweighs the number of visitors (although common courtesy may dictate that hospitality is provided in the latter case).

Hospitality will not normally be provided for meetings consisting solely of SIB staff with the following exceptions:

- staff training courses where it is not convenient to allow a break for participants to use the in-house catering facility (where an in-house catering facility is available and convenient, participants should pay for their own refreshments);
- Recruitment, promotion boards or selection panels.

- Meetings which are required to take place during lunchtime or are expected to last a considerable length of time where failure to provide modest refreshments would give rise to unnecessary disruption and inefficiencies. In all cases costs should be kept to a minimum.
- A measure of modest hospitality may be offered to those participating in training courses, both residential and non-residential. This facility may also be extended to cover conferences, seminars, approved team building sessions and workshops. The following guidelines apply:

  a. **Residential** (where at least one night's accommodation is being provided and paid for as an integral part of the course).

     i. Whilst it is normal practice to meet the cost of meals and light refreshments i.e. bottled water/biscuits/scones, this facility should not be extended to include payments for alcoholic refreshments.

     ii. Expensive hotels should be avoided.

     iii. The total cost of food and refreshment per person should be appropriate to the purpose and costs should be kept to a minimum.

  b. **Non – residential**

     i. Depending on the duration of the course/event, hospitality should be restricted to the provision of morning and afternoon tea/coffee (or bottled water) with biscuits/scones. The provision of snacks or a buffet-type meal at lunch time should be the exception and will be at the discretion of the Finance Director who should take into account factors such as background and number of attendees, the availability of alternative facilities and the benefits (if any) which such provision might offer in terms of the running of the course/event. Where lunch and light refreshments are provided, subsistence expenses will not be payable.

     ii. Where appropriate the in-house catering facility should be considered as the first option.

Refreshments provided should normally be limited to tea and coffee, scones or biscuits (in the case of recruitment and promotion boards, a light lunch may also be appropriate). However, reasonable provision should be made for staff who have a food intolerance and alternatives should be explored, e.g. the provision of gluten free biscuits, etc.

8.9 DRINKING AND DRIVING

Staff will recognise the need to set an example in terms of preventing drinking and driving. To this end, and bearing in mind the possibility that SIB might be perceived as being at fault if an attendee at an event was found to be driving with an alcohol level in excess of the legal limit, the following guidelines should be followed at relevant functions/events:

- Consideration should be given to providing low/no alcohol alternatives to alcoholic drinks; and
- An adequate selection and supply of soft drinks should always be made available.

Official funds are not available for expenditure on casual alcoholic drinks outside SIB's Office or NICS premises.

8.10 INWARD VISITS/OVERSEAS TRIPS

There may be occasions where visitors are taken to sporting and/or cultural events as part of an inward visit. These tend to be social occasions, but they may form an important part of networking for SIB.

Expenditure on all such hospitality should be within reasonable limits and should have the prior approval of the Finance Director, with the exception of when the CEO travels abroad, which should be approved by the Chair of the Board.

Where SIB staff find themselves in the position of offering hospitality when abroad on business, all of the principles set out above will apply, although the expenditure limits may be varied to reflect local market conditions.

On any occasion where the limits outlined in this document are likely to be breached, the rationale for this should be set out and prior approval should be obtained from the Finance Director.

8.11 PARTIAL HOSPITALITY

There may be occasions when SIB staff are away on business and attend lunches/dinners with clients and the total bill is split rather than SIB staff providing full hospitality to others. Whilst not formally hosting the meal, SIB staff may be seen in a host-type role.

In these circumstances, it can be embarrassing for SIB if staff, mindful of the subsistence rules, were to ask for the bill to be split on an actual basis per head. However, on an even split, it is possible that the cost to SIB will include an element relating to the food/drink of external guests, which may include alcohol.

The aim of this guidance is to acknowledge these situations and allow staff to network with clients at a lower overall cost to SIB than if full hospitality had been provided and will be referred to in this policy as 'partial hospitality'.

Partial hospitality is intended to cover attendance at meals with stakeholders. Shared meals with other individuals e.g. industry body representatives, employees of other public sector bodies etc. will continue to be considered under the normal subsistence rules.

Like all other forms of hospitality, the provision of partial hospitality should be, and should be seen to be, non-contentious, unostentatious and on a modest scale.

Where a claim is made for partial hospitality, subsistence expenses will not be payable. Staff should however bear in mind the current subsistence rates in place and ensure that any expenditure on partial hospitality is not excessive.

Where the partial hospitality takes the form of an evening meal, the element for refreshments, including alcohol and soft beverages, should not normally exceed a third of the total bill.

Full details specifying the purpose of the function, the number of guests and SIB officials attending, together with the itemised costs of food, drink, service etc. should be shown on the 'Authorization of Expenditure on the Hospitality Budget' form when claiming the expense.

Normal expenses rules regarding retaining receipts will apply. As other attendees may also require a copy of the receipt for their own expense claim, it will be acceptable to provide a copy of the receipt (e.g. a photograph taken on a mobile phone) rather than the original document.

9 Monitoring Arrangements – Gifts and Hospitality Register

The SIB Gifts and Hospitality Register will be subject to the following monitoring arrangements.

- The Finance Director and Chief Executive Officer will be responsible for monitoring the Register on a quarterly basis.
- The SIB Chair of the Audit Committee will review the Register on an annual basis and sign off that they have done so.

10 Data Protection

As per DAO (DFP) 10/06, the maintenance of gifts and hospitality registers includes some processing of personal data. This includes: the names of individual staff members receiving offers of gifts and hospitality; and the names of external individuals making offers to SIB staff. A privacy notice is published on the SIB website to make individuals aware that making offers to SIB may result in the processing of their personal data (names) in the published SIB Gifts and Hospitality Register.

At the point of receiving any offer from an external individual, staff should also alert them to the fact that they may need to record their name and the nature of the offer on the SIB Gifts and Hospitality Register.

Annex A – How to Report an Offer of a Gift or Hospitality for the Register

SIB maintains a Gift and Hospitality Register. It is saved in CM (DF1/07/110098). A copy is also included on the website.

SIB's Gift and Hospitality Register includes these details:

- the date the gift or hospitality was offered;
- the date of the event;
- who it was offered to;
- the organisation or individual making the offer;
- a description of the offer;
- the reason for the offer;
- details of contracts – current or potential;
- the estimated or actual value of the offer;
- action taken (accepted, refused, etc.) and the reason;

The form to complete an entry has been created on MS Forms and can be located here https://forms.office.com/e/PX39XwC748. The link will be available on the Intranet and SIB's App. The Information and Compliance Manager will send quarterly reminders to all staff to ensure they report all offers of gifts and hospitality.

Annex B – Approval Process to Receive a Gift or Hospitality if Over £50

If an offer of either a gift or hospitality is valued above £50, approval must be received prior to accepting it.

When completing your entry for the Gifts and Hospitality Register (https://forms.office.com/e/PX39XwC748), you are requested to complete Section 2 if the value is above £50. The additional questions include:

- What is the Estimated / Actual Value of the offer?
- Reason you wish to accept
- If you wish to accept, will you:
  - Retain and use yourself
  - Donate
- Is there any other information you would like to provide regarding this offer?

The request will be sent to either your Line Manager or the CEO by the Information and Compliance Manager for review and a decision.

The decision and supporting documentation will be saved in CM by the Information and Compliance Manager. She will also update the Register accordingly.

Annex C - Suggested Text to Use to Decline a Gift or Offer of Hospitality

SIB 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 SIB. I hope you will accept our response in that spirit and that we can look forward to continued effective working relationships.

Annex D – Pre-authorisation of Official Hospitality Expenditure

If an employee requires either hospitality to be provided at a meeting or event or if the venue has a cost, **they are required to get authorization in advance** from the Finance Manager or Finance Director.

The process will be as follows:

1. The employee seeks quotes for the event based on estimated numbers, requirements and venue cost (if applicable)
2. The employee completes this form: https://forms.office.com/e/i5tt3w5uLq (see below for content of form)
3. The Finance Manager is automatically notified when a request is submitted
4. He opens the request and either approves or refuses the request
5. He copies the Finance Officer into the decision
6. She generates a pdf of the request, generates a purchase order if required and sends those to the requestor
7. The requestor places the order with the supplier/venue
8. The Finance Officer updates the spreadsheet with the details of the request, decision and PO (SIB1/25/6268)
9. The Finance Officer saves all the emails in the appropriate CM container (SIB1-25-220)
10. After the event takes place, the invoice should be forwarded to the Finance Officer to facilitate payment

The form requests the following information:

- Person making request
- Date of Event
- Venue of Event (Kelvin, external free, external with cost)
- Business Purpose of the Event
- Planned Number of Attendees
- Names of Attendees (if known)
- Type of Hospitality (refreshments at a meeting, ie tea, coffee, scones; Breakfast, Lunch, Dinner, Other)
- Estimated Expenditure (quotes should be sent to the Finance Manager separately)
- Cost of food and non-alcoholic beverages
- Cost of Alcoholic beverages
- Total cost of hospitality
- Cost per Head
- Are there Additional Room Hire Costs? (yes/no)
- If yes, Cost + 20% VAT = Venue Cost
- Grand Total

When making a request for hospitality, the following guidelines should be followed:

- The hospitality is required to further the government or taxpayer's interests.
- The hospitality expenditure will deliver value for money.
- No more than half of the attendees will be Public Sector employees or, if this is not the case, that the event is covered by the specific exceptions in the SIB Financial Policies & Procedures Manual.
- That only expenditure of less than £30 per head, of which no more than 33% may be for alcoholic drinks, will be provided.

Annex E – Quick Reference Guide for Offers Made to SIB Staff

This list is not exhaustive as it is not possible to anticipate every situation. Furthermore, judgement will be required on a case by case basis.

Type of hospitality	Normally appropriate to accept?	Approval required?	Reporting required?
1. Modest conventional hospitality (e.g. tea/coffee, biscuits/scones, sandwich lunches)	Yes	No	No but working lunches other than sandwich lunches do need to be reported to ensure they do not become frequent or repetitive.
2. More formal lunch or dinner, by prior invitation	Yes	Prior approval required from Director and above or Chief Executive.	Yes – record in Gifts and Hospitality Register whether accepted or refused.
3. Commemorative or similar occasion organised by contractor, consultant or supplier (e.g. to celebrate an anniversary, opening or handover	Yes	Prior approval required from Director and above or Chief Executive.	Yes – record in Gifts and Hospitality Register whether accepted or refused.
4. Trade promotion on company's premises with meals or drinks	Yes	Prior approval required from Director and above or Chief Executive.	Yes – record in Gifts and Hospitality Register whether accepted or refused.
5. Annual dinner of Professional Institute or Association: • where the officer is a guest of the Institution or Association • where the officer is a guest of a particular consultant, contractor or supplier	Yes	Prior approval required from Director and above or Chief Executive.	Yes – record in Gifts and Hospitality Register whether accepted or refused.
6. Overseas visits for conferences	Yes	Prior approval required from Finance Director or Chief Executive.	Yes – record in Gifts and Hospitality Register whether accepted or refused.
7. Leisure events, complementary tickets, sporting events and weekend breaks or holidays This is not a prescriptive list	No – these are examples of hospitality which may not be accepted other than in exceptional circumstances when acceptance can be demonstrated to be in the best interests of SIB	N/A In those exceptional circumstances, approval must be gained from CEO.	Yes – record offer and reason for refusal in Gifts and Hospitality Register

Type of gift	Normally appropriate to accept?	Approval required?	Reporting required?
1. 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	Yes	No	No
2. Other token gifts under the value of £50	Can be accepted	Yes – if accepted Staff member's respective SLT member	Yes – record in Gifts and Hospitality Register whether accepted or refused If accepted note why not practical / possible to follow general principal of refusal
3. Expensive gifts (£50 or more)	Can be accepted	Yes – if accepted Staff member's respective SLT member	Yes – record offer and reason for decision in Gifts and Hospitality Register
4. Lottery tickets, cash, gift vouchers, gift cheques, alcohol and cigarettes / cigars	No	N/A	Yes – record offer and reason for refusal in Gifts and Hospitality Register
5. Trade or Discount Cards through which an individual Officer might personally benefit from the purchase of goods or services at a reduced rate	No	N/A	Yes – record offer and reason for refusal in Gifts and Hospitality Register
6. Gifts of any kind (other than trivial gifts mentioned in point no. 1) from a supplier / contractor offered to staff involved in procurement or monitoring of a contract	No	N/A	Yes – record offer and reason for refusal in Gifts and Hospitality Register

Gifts and Hospitality Authorisation Form and Gifts and Hospitality Register must be completed on all occasions.

Annex F – Quick Reference Guide for Offers Made By Staff

This list is not exhaustive as it is not possible to anticipate every situation.

Type of hospitality/gift	Detail	Approval required?
1. Hospitality provided as part of an SIB event	Not covered by this policy – must be justified and approved in advance as part of the event arrangements	Contained within the business case and approved within delegated approval levels
2. Light refreshments for meetings	Consider the length of the meeting, number of visitors as compared to SIB staff. Provide full details on Hospitality prior approval form.	Prior approval from Finance Manager or Finance Director required
3. Provision of external dining	Consider internal catering in the first instance. Guest numbers should exceed SIB staff, or, in exceptional cases, if SIB staff exceed then Director approval will be required. Hotel or restaurant used should be appropriate to the purpose and meal should be modest – not exceeding £60 for dinners including black tie, £40 for formal lunches, £25 for casual working lunches and £20 for breakfast / buffet. Beverages must not exceed one third of the bill and a director approval is required in advance if alcohol is to be included	Prior approval from Finance Manager or Finance Director required
4. Working lunches within SIB	Should not be the norm and only when - impossible to accommodate meeting other than lunch time and - need to make provision for non-SIB staff. Costs should be kept to a minimum.	Prior approval from Finance Manager or Finance Director required
5. Inward visits	Hospitality for external dining as set out at 3 above.	Prior approval from Finance Manager or Finance Director required
6. Overseas trips	When offering hospitality abroad, all of the above rules apply though limits may be varied to reflect local market	Please contact Finance Director for advice
7. Overseas trip by the CEO	When offering hospitality abroad, the CEO must seek approval in advance from the Chair of the Board and agree an estimated limit on the spend.	Prior approval from Chair of Board
8. Partial hospitality	Aim is to allow staff to network with stakeholder at a lower overall cost to SIB than if full hospitality had been provided. Designed to cover occasions where while travelling on business and attending lunches/ dinners with others, the bill is split evenly possibly resulting in the SIB staff member share including an element relating to food or alcohol of other attendees.	Prior approval from CEO or Finance Director required

Annex G – Policy Note: Exceptional Circumstances for SIB CEO's International Business Travel

Purpose

This policy outlines the exceptional circumstances under which the Chief Executive Officer (CEO) may be authorised to travel abroad for official business. It is guided by DAO (DoF) 10/06 on propriety and accountability in public service, and aligned with the strategic priorities of the Strategic Investment Board (SIB) and the Investment Strategy for Northern Ireland (ISNI).

Principles

- All international travel must be essential, strategically aligned, and defensible in public.
- Travel must support the delivery of infrastructure transformation, investment planning, or cross-border collaboration.
- All relevant policies and guidance must be taken into consideration, including:
    - Dear Accounting Officer Letter, DAO (DFP) 10/06 – Acceptance and Provision of Gifts and Hospitality. Appendix 2 of the DAO contains mandatory guidance on the acceptance of gifts and hospitality.
    - SIB's Gifts and Hospitality Policy.
    - The SIB Staff Handbook.
    - SIB's Guidance on Conflicts of Interest.
    - SIB's Policy and Procedures on Fraud.
    - Dear Accounting Officer Letter, DAO (DFP) 09/11 – Bribery Act 2010. Staff should be aware of this guidance, DAO (DFP) 09/11, in the context of the provision and receipt of gifts and hospitality.
    - Dear Accounting Officer Letter, DAO (DoF) 07/21 – Conflicts of interest guidance: DAO (DoF) 07/21.
    - Fraud Act 2006.
- Approval must be obtained from the Chairman of the Board, with full documentation of purpose, cost, and expected outcomes.

Strategic Justification

1. Alignment with Strategic Investment Board Objectives

The SIB supports government departments and councils in delivering long-term transformation projects across physical, digital, social, and environmental infrastructure. CEO travel may be justified when:

- Representing Northern Ireland in international investment forums to attract capital for major infrastructure programmes.
- Engaging with global partners to champion reform and share best practices in infrastructure delivery.
- Negotiating or promoting strategic partnerships that support SIB's role in investment planning and delivery.

2. Support for ISNI Actions

The ISNI sets out priority areas for infrastructure investment and aims to deliver the largest infrastructure programme in Northern Ireland's history. CEO travel may be necessary to:

- Promote ISNI-aligned projects to international investors, development banks, or philanthropic funders.
- Participate in global infrastructure summits or bilateral meetings that advance ISNI's five strategic objectives:
    - Inclusive growth
    - Sustainable development
    - Digital transformation
    - Resilient public services
    - Environmental protection

Examples of Exceptional Circumstances

- Attendance at a global investment summit where the CEO is a keynote speaker promoting Northern Ireland's infrastructure pipeline.
- Participation in bilateral negotiations with foreign governments or investors for co-financing of ISNI priority projects.
- Representation at international governance bodies or networks where Northern Ireland holds a leadership role.

Governance and Transparency

- For each business trip, a written request must be submitted to the Chair of the Board detailing:

    - Strategic alignment with SIB.
    - Why the travel is essential.
    - Estimated costs.
- All travel must comply with DAO (DoF) 10/06 guidance on propriety, regularity, and value for money.
- Outcomes must be reported post-travel and recorded in the organisation's governance records.

Request for Prior Authorisation for Offering Hospitality when Abroad

Name:	
Date(s) of Travel:	
Description of Business Trip or Event (include strategic alignment with SIB and justification as to why the travel is essential):	
Total estimated **hospitality costs** required (do not include travel costs, such as flights/hotel):	
I confirm I have consulted the Finance Team to ensure this expenditure can be met ☐	
I certify that: • The hospitality is required to further the government or taxpayer's interests. • The hospitality expenditure will deliver value for money. • I will provide all necessary receipts to Finance as required.	
Decision by Chair of the Board:	
Date:	