



Department of
Health

An Roinn Sláinte

Máinnystrie O Poustie

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<p>Subject:</p> <p>GUIDANCE ON THE ACCEPTANCE OF GIFTS AND HOSPITALITY AND AWARDS (AND CONFERENCES)</p>	<p>Circular Reference: HSC(F) 19-2025</p> <p>DoH Reference: HE1/25/321437</p> <p>Date of Issue: 9 September 2025</p>
<p>For Action by:</p> <p>Chief Executives, Directors of Finance, of all HSC Bodies and NIFRS</p> <p>Summary of Contents:</p> <p>This circular provides guidance on the provision of hospitality, gifts and awards and conferences.</p> <p>Enquiries:</p> <p>Any enquiries about the contents of this Circular should be addressed to:</p> <p>Finance Policy, Accountability & Counter Fraud Unit Department of Health Room D3, Castle Buildings Stormont Estate BELFAST BT4 3SQ</p> <p>fpau@health-ni.gov.uk</p>	<p>Related documents:</p> <p>DAO (DFP) 10/06</p> <p>Superseded Documents:</p> <p>Status of Contents:</p> <p>Action</p> <p>Implementation:</p> <p>Immediate</p>

Introduction

1. The purpose of the circular in **Annex 1** is to draw your attention to the attached departmental guidance on the acceptance and provision of gifts, hospitality and awards.
2. This guidance has been developed based on DAO (DFP) 10/06, which is the current guidance issued by the Department of Finance (DoF) in relation to the acceptance and provision of gifts and hospitality.
3. Some references in DAO (DFP) 10/06 to the NICS personnel policy have been superseded but any updates have been reflected in the guidance included in this circular.

Action

4. Please ensure that this circular (including Annexes) is brought to the attention of the appropriate staff in your business area and that any relevant action points are noted.

Enquiries

5. Should you have any queries please contact Financial Policy and Accountability Unit, fpau@health-ni.gov.uk.

Yours sincerely

A rectangular box containing a handwritten signature in black ink that reads "K Needham".

Kathy Needham

Financial Policy, Accountability and Counter Fraud Unit

PROVISION AND ACCEPTANCE OF GIFTS AND HOSPITALITY INCLUDING CONFERENCES

1. This circular sets out guidance on the provision and acceptance of hospitality by staff in public sector bodies, including when and to whom it can be extended, the type and scale of hospitality allowed, the procedures to be followed when authorising hospitality, the accountability of management and authorising officers in relation to hospitality extended under their authority, and what aspects should be taken into consideration when deciding on whether or not to accept offers of gifts and hospitality.
2. **Section 1** of the circular relates to the provision and acceptance of gifts.
3. **Section 2** relates to the provision of hospitality.
4. **Section 3** relates to offers of hospitality to a public servant.
5. **Section 4** sets out the requirement to maintain a Gifts and Hospitality Register.
6. In relation to any gifts or hospitality given or received, consideration should be given to the central importance of **propriety** and **correctness** in line with the Nolan principles.

SECTION 1 PROVISION AND ACCEPTANCE OF GIFTS

7. A gift is defined as 'something voluntarily donated, with no preconditions and without the expectation of any return' and includes all transactions which are economically indistinguishable from gifts, such as donations or long-term loans. Grants and grants-in-aid are not considered gifts.

PROVISION OF GIFTS

8. The regulations governing expenditure on gifts are contained in Annex 4.12 of Managing Public Money Northern Ireland (MPMNI) Managing Public Money Northern Ireland [Managing Public Money NI](#) and also the NICS Staff Handbook Standards of Conduct¹.
9. ALBs have a delegated limit of £250 for gifts to an individual. DoF approval is required for any gift made with a value above £250. In respect of collective gifts to any range of individuals or entities where the value of the gift(s) to any one individual exceeds £250 or when the value of the collective gift(s) exceeds £5,000, prior approval must be sought from DoF. In these cases, a submission should be sent to Finance Policy and Accountability Unit, D3, Castle Buildings (or email to fpau@health-ni.gov.uk) who will seek approval from DoF Supply.

ACCEPTANCE OF GIFTS

10. The conduct of public sector staff must not even foster the suspicion of a conflict of interest. Therefore, staff should not do anything that may give the impression to colleagues, members of the public, or people with whom they deal in an official capacity, that they have been, or may have been, influenced by a gift or consideration to show bias either for or against any person or organisation while carrying out their official duties.

¹ Although the NICS handbook was designed specifically for N.I. Civil Servants, many of the general principles are relevant and applicable to all public sector bodies.

11. Furthermore, under the Prevention of Corruption Act 1916, any money, gift or consideration received by a member of staff from a person or organisation holding, or seeking to obtain, a government contract will be deemed by the Courts to have been received corruptly unless you can prove to the contrary.

12. The general principle therefore is that all gifts offered to staff should be refused. However, modest seasonal or promotional gifts (such as calendars, diaries, pens or similar items) with a value of less than £50 may be accepted without the need for these to be reported or approved in advance by line management, provided they bear Company names and/or logos. This type of gift is easily distinguishable from more expensive or substantial items, which cannot on any account be accepted.

13. It is recognised that there are exceptional cases where refusal of a gift would clearly offend the donor, cause embarrassment or appear discourteous, such as gifts received from an overseas government or governmental organisation. In these cases, full details of the circumstances should be notified for consideration in line with ALB policy.

14. The decision must be made as to whether the gift should be:

- accepted; or
- accepted on the condition that a reciprocal gesture is made at your own expense; or
- returned to the donor with a suitably worded letter explaining why the gift cannot be accepted; or
- used or disposed of, if possible, in or by the ALB.

15. If a gift is accepted, the following rules apply:

- i. its receipt should, in all cases, be reported in accordance with the ALB policy.
- j. when the acceptance of a gift is reported, ALBs the following alternative courses of action are available:
 - b. the gift may be disposed of by sale; or

- c. it may be displayed or used in the ALB where this is appropriate; or
 - d. if the disposal of the gift would cause offence or if it might be appropriate for the recipient to use or display the gift on some future occasion as a mark of politeness, the gift should be retained in the ALB for this purpose for up to five years; or
 - e. if the gift is of small value (which should not in any case exceed £50), the recipient may in appropriate cases be allowed to retain it.
- k. liability to duty and Value Added Tax of all imported gifts should be resolved with HM Revenue and Customs (International Trade Section).

SECTION 2 PROVISION OF HOSPITALITY

16. Hospitality includes any type of refreshments or entertainment provided out of public funds to anyone, be they a public servant or official, representative of a public or private body or organisation, or a private individual.
17. On every occasion hospitality extended should be in the direct interest of the ALB and proportionate to that interest. It is essential that staff exercise careful budgetary control over such expenditure.

HOSPITALITY WITHIN PUBLIC BUILDINGS

18. Hospitality should not be extended at internal meetings, staff functions or events for the following reasons:
 - Value for money is not demonstrated through the provision of internal hospitality;
 - The current financial climate cannot support expenditure on non-essential hospitality;
 - The provision of hospitality to staff is generally considered a taxable benefit by HMRC and would need to be reported to HMRC and accounted for correctly²;
19. Although the general principle is that hospitality should only be offered to non-public sector guests, or where public sector guests are in the minority, there is some flexibility regarding expenses incurred for refreshments at meetings to which ALB/Departmental colleagues, representatives from other ALBs/Departments or persons outside the public sector are called for

² HMRC accepts that providing tea and coffee is a trivial benefit. However, when Departments are providing lunches (or dinners if that applies) for internal staff, this does not fall into one of the exemptions. It is a taxable benefit by law under the Income Tax (Earnings and Pensions) Act 2003. For an exemption from tax to apply to such meals, the meals must be provided on a reasonable scale and all employees or all those at a specific location may obtain the free or subsidised meals (see **Annex 2** for more details).

conference. The extension of hospitality in these circumstances is permissible provided refreshments is limited to tea/coffee and that the persons present include representatives from other ALBs/Departments and/or colleagues who do not work under the direct control of the Chairman.

20. Approval for hospitality should be sought in advance in line with organisational policy and delegated limits.

HOSPITALITY OUTSIDE GOVERNMENT BUILDINGS

21. Consideration should be given to the costs of hosting meetings. Meetings should ideally be held inhouse or virtually. Where this is not a viable option, the first consideration should be to use other buildings within the health service, other Departmental ALBs and thereafter to other outside Government buildings, prior to selecting non-Government buildings.

22. In all cases staff should ensure that they can demonstrate best value for money when arranging conferences and hospitality through the preparation of a proportionate business case.

23. Prior written approval should be obtained from the approving officer regarding: the appropriateness of extending hospitality; the type of hospitality proposed; the scale and cost of hospitality proposed; the guest list; and the venue. For hospitality, there is a division between, for example, working lunches and more expensive social functions, including travel or accommodation. More formal functions by prior invitation should be approved at Director level or above.

24. Approving officers are responsible for ensuring adherence to the guidelines. It is important that the Chief Executive has a defence against charges that the level of hospitality is excessive or that staff are being entertained at the taxpayers' expense. Where there is doubt about any particular event, approving officers should seek advice or err on the side of caution and reject the request.

25. All officers must always exercise budgetary control over hospitality expenditure.

26. Staff should be reminded that they **cannot claim day subsistence allowance** where lunch was provided at a function.

27. All travel and subsistence claims should be made in accordance with HMRC guidance - [Travel and subsistence costs - GOV.UK](#)

PROCUREMENT REQUIREMENTS

28. Procurement regulations and Procurement Control Limits are applicable to hospitality expenditure and should be fully adhered in accordance with [PPN 04/21](#).

DOCUMENTATION

29. The purchase and payment for hospitality bought from outside must be approved, authorised and documented in the same manner as the purchase of any other type of good or service, with due consideration given to Value for money assessment and compliance with [Managing Public Money Northern Ireland](#).

30. In particular this documentation must include:

- a written request for permission to extend hospitality and for the type and scale of hospitality proposed;
- a complete guest list, detailing employing organisations and, if not immediately apparent, reasons for invitation;
- written approval for the type and scale and estimated cost of hospitality proposed, and for the guest list;
- evidence of having followed procurement guidelines and of having sought the best deal;
- an approved proportionate business case along with supporting receipts/invoices detailing separately the purchase of food, drink, any other type of entertainment.

- Scanned copies of all documentation related to the provision of hospitality should be retained available for audit inspection.

CLASSIFICATION AND IDENTIFICATION OF HOSPITALITY EXPENDITURE

31. All expenditure on hospitality should be clearly identified and information on the type of hospitality should be provided and the cost coded to an appropriate hospitality general ledger code or an alternative method conducive to effective monitoring and control.

32. It is not permissible to obscure the purpose of expenditure on hospitality by subsuming such expenditure within other general ledger expense account codes.

33. Hospitality budgets should be created where required and actively monitored.

SECTION 3 ACCEPTANCE OF HOSPITALITY

34. In deciding whether hospitality can be accepted, it is important to consider not just the offer itself, but also the appearance of the gift to others and the circumstances surrounding it. For example, an isolated acceptance of, for example, meals, tickets to sporting, cultural or social events may be acceptable if attendance is justifiable in the interests of the ALB, Government or Departments. However, acceptance of frequent, regular, annual or seasonal invitations, particularly from the same source, may breach the required standards of conduct.

35. In deciding whether hospitality can be accepted, you should bear in mind the following principles:
 - a. Acceptance should be considered in the context of business need and/or effectiveness;
 - b. Acceptance must not place any obligation on the recipient;
 - c. Hospitality that is frequent, lavish or prolonged should not generally be accepted;
 - d. Any hospitality should be unconnected with any decision affecting the organisation or individual offering it;
 - e. Hospitality that is accepted should always be justifiable; and
 - f. The benefits of acceptance should outweigh the risk of possible misrepresentation of the hospitality.

36. In all instances where other than conventional hospitality is offered, approval should be sought in line with the organisational policy and delegated limits. If doubts persist the matter should be referred to the ALB Director of Finance.

37. Some invitations, particularly to senior staff, are extended in a representational capacity. Whilst such invitations may generally be accepted within reasonable limits, care should be taken to ensure that there is not ALB/NICS over-representation at the function concerned.

38. On occasions it may be appropriate for a partner to accompany you as a senior officer where the event so justifies.

39. Numbers of ALB officials should be kept to the minimum necessary and should not normally exceed the number of visitors. The same guests should not be offered hospitality on an automatically recurrent or regular basis, or solely as a return gesture.

SECTION 4 GIFTS AND HOSPITALITY REGISTER

40. All Senior Staff are responsible for ensuring a Register of Gifts & Hospitality is in place and properly maintained and updated for their Business Area. Directors should ensure that all staff are aware of this guidance and how to update their Directorate register. The purpose of the Register will be to counter any possible accusations or suspicions of breach of the rules of conduct by staff. The registers are subject to **Freedom of Information (FOI)** queries.
41. Gifts and Hospitality information relating to Senior staff should be collated annually for review and publication on the ALB's website.
42. Registers must include gifts/invitations from all third parties, including the Department and other ALBs.
43. Example templates 3A and 3B for registering gifts and hospitality are attached at **Annex 3**.

ANNEX 2

Income Tax (Earnings and Pensions) Act 2003³ HMRC Rules on providing meals for staff.

Particular benefits: subsidised meals: canteen meals

Section 317 ITEPA 2003, section 60 FA 2010

There is no tax charge on the provision of meals for directors or employees if the meal is provided in a canteen or on the employer's premises and the following conditions are met:

- the meal is on a reasonable scale; and
- all employees, or all employees at a particular work location, may obtain a free or subsidised meal (or a voucher for one); and
- in the case of a hotel, catering or similar business, if free or subsidised meals are provided for employees in a restaurant or dining room when meals are being served to the public, part of the dining area must be designated for staff use only and the meals must be taken in that part; and
- with effect from 6 April 2011, the meals are not provided as part of salary sacrifice or flexible remuneration arrangements. (But see EIM21675 for details of canteen arrangements that are already taxable prior to 6 April 2011).

³ [Income Tax \(Earnings and Pensions\) Act 2003 \(legislation.gov.uk\)](http://legislation.gov.uk)

