



Commonwealth Scholarship Commission in the UK

CSC Gifts and Hospitality Policy and Procedure

1. Policy

- 1.1 The Chair and other Commissioners should declare any gifts, hospitality or other benefits that they have received or given, accepted or declined, in their capacity as a Commissioner, for inclusion in the Register of Commissioners' Interests.
- 1.2 Commissioners must not put themselves in a position where their actions can reasonably be perceived to be open to improper influence. As such, the context of a gift being received or given should be assessed as to whether this would influence Commission decision making
- 1.3 This CSC Gifts and Hospitality Policy should be considered in conjunction with the CSC Conflict of Interest Policy
- 1.4 Commissioners should also declare if they have received any bribes related to their work as a Commissioner.

2. Background

- 2.1 The CSC is committed to ensuring the highest standards of conduct in all that it does. For Commissioners, these standards are reinforced by the Commissioner Code of Conduct
- 2.2 The Commission is aware that Conflicts of Interest and the offer of gifts and hospitality can occur in the course of their work and it is important that they know what to do if or when this happens
- 2.3 The National Audit Office requires that members and their close family members record all gifts, hospitality or other material benefits received which in any way relate to the member's appointment as a member of the Commission.

3. Principles

- 3.1 Commissioners should not normally accept or give gifts and hospitality, but the CSC recognises that in some cases non acceptance may cause embarrassment to the provider. For example, the gift may be a gesture of thanks from a CSC Scholar to a Commissioner or Secretariat member, which holds no known monetary value.
- 3.2 All offers of gifts and hospitality which might be perceived to compromise a Commissioner's personal judgment or integrity should be declined
- 3.3 Commissioners must be aware that offers of this kind may place them in a difficult position, because to refuse may cause misunderstanding or offence. For example, if the offer was to come from an overseas government

organisation. On the other hand, to accept could involve criminal liability or give rise to questions of impropriety.

4. Procedure

- 4.1 All Commissioners must declare any gifts, hospitality and other benefits on the Register of Interests Form every six months whilst a Commissioner. This must be signed and dated. This form is provided on a six-monthly basis by the Secretariat prior to the May and December Commission meetings. Section Two of the Register of Interests Form covers gifts, hospitality and other benefits
- 4.2 All gifts, hospitality and other benefits should be registered, whether accepted or declined, with an indication of their value
- 4.3 If a Commissioner is in any doubt if to wait to declare a gift, hospitality or other benefit until when the form is next due, they should declare it as soon as possible with the Secretariat
- 4.4 Notification of all gifts, hospitality and any other benefits should be sent to the Executive Secretary, or their delegate, who will record them in the Register of Commissioners' Interests.

5. Acceptance and Authorisation

- 5.1 If the value is greater than £25, authorisation must be sought from the Commission Chair and in the case where it is the Commission Chair, the Executive Secretary must be consulted
- 5.2 Commissioners can seek advice at any time from the Commission Chair if they are unsure if to accept a gift or if they have accepted a gift and wish to return it. This could prevent any misunderstanding if a gift was to be seen to hold any influence over decision making.

6. Hospitality

- 6.1 Any hospitality accepted should be in the interests of the Commission and help further its objectives. It should not be over-frequent or over-generous. Accepting hospitality from the same organisation could lead to a perception that the work of the Commission is being influenced by the objectives of a single organisation. Any hospitality accepted should not seem lavish or disproportionate to the nature of the relationship you have with the provider.

7. Resolving Conflicts of Interest caused by Gifts and Hospitality

- 7.1 Accepting gifts and hospitality in certain circumstances must be balanced with upholding high standards of propriety and guarding against any reasonable suspicion of perceived or actual conflicts of interest or an undue obligation being created
- 7.2 If a Commissioner accepts a gift, hospitality or other benefit and finds themselves in the position of taking a decision or making a judgement on the provider, they should declare a potential Conflict of Interest.

8. Failure to Declare Gifts and Hospitality

8.1 If a Commissioner fails to declare the receipt or giving of a gift, hospitality or other benefit, this will be referred to the Commission Chair. In cases where this concerns the Chair, this will be referred to the Executive Secretary. As Commissioners are appointed by the Secretary of State for Foreign and Commonwealth Affairs, the Commission reserves the option to inform the Foreign, Commonwealth and Development Office (FCDO) where appropriate action will be taken in line with FCDO policy and procedure.

9. CSC Secretariat Staff

9.1 CSC Secretariat staff should follow the best practice and principles of the CSC's Gifts and Hospitality Policy. If under any uncertainty, they should seek advice from their line manager.

10. Monitoring and Review

10.1 The Gifts and Hospitality Policy and Procedure is regularly reviewed and updated, as is the system for recording and managing gifts, hospitality and other benefits

10.2 The Register of Interests is open to public inspection upon request.