

Sensitive Transactions Policy

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Purpose

To provide clarity and guidance on decisions relating to the receipt of gifts and hospitality by AMS (GB) Ltd t/a Solo Group (Solo) staff and expenditure on the same for staff or others. The intention is to ensure staff exercise integrity and financial prudence so that the risks associated with sensitive transactions are minimised.

Principles

Sensitive transactions are those of a discretionary nature where there is, or is perceived to be, personal benefit in addition to the benefit to Solo. They often arise in the context of hospitality, travel or appreciation of professional services.

In making judgements about the appropriateness of sensitive transactions, staff should consider whether:

- The transaction aligns with the purpose, character and business interests of Solo
- Publicity about the transaction could harm the reputation of Solo
- The transaction could be seen to create a conflict of interest or future obligation

Sensitive expenditure by Solo staff should always be moderate, related to the objectives of Solo and be appropriately authorised and documented. Receipt of gifts or hospitality should never be solicited and should be rare, of modest value and declared.

Specific guidance

Staff functions and gifts

As a good employer, Solo welcomes and farewells staff, and occasionally celebrates a significant achievement, with a modest function, generally a lunch or dinner. The costs should be modest and proportionate to the event.

Farewell gifts should not exceed £200 in value, other than in exceptional circumstances. This is calculated on the basis of £40 per year, up to five years' service. Staff should be encouraged to make a personal donation to any gift. Gifts for any other personal event such as a birthday, graduation or wedding should be funded personally by colleagues.

Flowers to mark a bereavement or illness of a staff member or close relative may be sent, up to the value of £75.

Where staff gather for a professional development event or similar gathering, Solo provides modest catering when the meeting spans normal mealtimes.

Staff travel

Solo will pay for travel, meals, accommodation and necessary incidental expenses for approved travel. This may include airline tickets, rental cars, public transport tickets, taxis, mileage and parking costs. All overseas travel is viewed as sensitive expenditure, and care must be taken with costs and approval.

Solo will not pay for movies or other entertainment, parking fines or traffic infringements, hotel minibar costs, books or magazines which are not work-related, snacks while travelling or petrol other than for a rental car or that agreed as part of a staff member's employment conditions.

When staff are travelling on Solo business, meals and other incidentals will be paid based on actual and reasonable costs. Any excess is a personal cost to the staff member.

Professional affiliations

Membership of a professional body is sensitive expenditure as it is personal in nature. A professional membership fee may be paid by Solo if membership is:

- Clearly relevant to the performance of the staff member's duties and for the benefit of Solo
- For no longer than one year in duration, unless a significant discount can be obtained by paying for a longer period.

Solo gifts & hospitality

Gifts may be given to external parties as a token of appreciation in certain circumstances, such as non-remunerated or subsidised services to Solo or as a culturally appropriate act of reciprocity. The value of any gift should be modest and proportionate.

When Solo staff host a meeting or event with external participants, normal host courtesies and responsibility apply, including provision of refreshments and meals, when appropriate. These should be moderate in cost and, if beer and wine are served, restricted to one or two servings per guest. Host responsibility extends to meeting the cost of travel home by any Solo staff required to attend an after-hours function, when their usual means of commuting is not available or not safe.

Business gifts & hospitality

Staff may accept hospitality and gifts where the gift is infrequent and inexpensive, except where:

- there is a perceived or actual conflict of interest;
- The gift is in cash, or is redeemed for cash
- it could be viewed by others as an inducement or reward that might place the University under an obligation; or
- staff are involved in a tender process

Any gift or hospitality with a value over £50 should be declared to the staff member's manager. The manager may approve acceptance, or require any gift received to be returned, re-gifted or shared with colleagues.

Hospitality is generally accepted where it arises in the context of a conference or meeting, with the cost covered in the entry fee or where the duration of the meeting justifies refreshments.

Solo staff may, with the approval of their manager, accept speaking commitments at conferences or similar gatherings where some or all of the costs of attending are paid, and the event is clearly relevant to their work.

Where a staff member seeks or is offered cash for employment or activities outside Solo, and where that activity is substantively similar to their role or could affect their ability to carry out their duties, it could constitute a conflict of interest. The staff member should initiate a conversation with their manager to clarify before accepting any such employment or activity.

Compliance

Colleagues who have any concerns about an employee's decision making on gifts and hospitality should raise them with their manager, for investigation. Staff who fail to comply with the provisions of the Sensitive Transactions Policy may be subject to disciplinary action, potentially leading to dismissal.

Approval & Review

The Sensitive Transactions Policy is subject to the normal three-yearly review. Review and approval is the responsibility of the directors.

Issued: 28 August 2020 Next review: August 2023