



Procedures and Guidance on the Provision of Hospitality, Gifts and Events

Document Control

Version No.	Date	Description
1.0	11/10/2016	SMT
2.0	28/10/2016	Policy & Practice Committee
3.0	04/12/2018	SLT
3.0	01/02/2019	Policy & Practice Committee
3.0	22/02/2019	Board

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1. Classification of Expenditure

1.1. It is important to ensure that all expenditure on Hospitality, Catering and Events is recorded correctly. Expenditure should be classified as follows:

- a) Hospitality – an event, formal or informal, where one or more external guests are invited and provided with any form of food or drink. The venue can be internal or external;
- b) Catering – costs for food and drink provided for internal meetings, training events or programmes provided to service users under an order or licence, where all the attendees must be PBNI employees or service users. If any external guests attend (excluding trainer) then it must be treated as hospitality; and
- c) Events - conference, seminars, workshops. All costs (including catering, management, printed materials and event management costs) associated with a conference,/seminar/workshop organised by PBNI involving one or more external stakeholders.

1.2. The following are examples of expenditure that might be incurred under each of these headings but this is not an exhaustive list:

Hospitality	<p>Chief Executive hosts a private dinner for a group of key stakeholders or a visiting Government Minister;</p> <p>Working dinners with senior officials from within PBNI or wider public sector.</p> <p>A lunch or dinner hosted by the Chief Executive for political correspondents at a local restaurant.</p>
Catering	<p>Tea and coffee provided at the end of a staff team meeting;</p> <p>Refreshments provided during a business meeting;</p> <p>Refreshments ordered for Director's meetings; or</p> <p>Refreshments provided during Team development/planning days.</p>
Conferences, seminars and workshops	<p>All costs associated with a PBNI hosted Conference;</p> <p>Criminal Justice seminars;</p>

	<p>The costs of hiring professional conference management skills;</p> <p>Costs associated with conferences including backdrops, printed material and signage; or</p> <p>Policy consultation with stakeholders.</p>
Gifts	<p>Gifts provided of an inexpensive nature include pens/stationery which promote the work of PBNI;</p> <p>Gifts of cash or cash equivalents,</p>

2. Roles and Responsibilities

2.1. Chief Executive

The Chief Executive, as Accounting Officer, has a leadership role in relation to propriety – his or her actions and behaviour should set a high standard for the organisation. The essence of an Accounting Officer’s role is a personal responsibility for the propriety and regularity of the public finances for which he or she is answerable; for the keeping of proper accounts; for prudent and economical administration; for the avoidance of waste and extravagance; and for the efficient and effective use of the available resources. The Accounting Officer is also held ultimately responsible under the Bribery Act 2010 for ensuring that PBNI is compliant with this legislation and that as a result proportionate steps are taken to prevent bribery.

2.2. Head of Finance

The Head of Finance has the lead advisory role on hospitality, gifts and events in PBNI. He or she should ensure that guidelines are in place in respect of the provision and acceptance of hospitality, gifts and events that any possible conflicts of interest are identified and that appropriate action is taken to resolve them. The Head of Finance is also the Nominated Officer for reporting of suspected frauds and cases covered under the Bribery Act 2010.

2.3. Directors

Responsibilities will include taking decisions affecting the provision and acceptance of hospitality, gifts and events within their Directorates and

departments. They should ensure that local systems are established in order to demonstrate and monitor compliance with this document.

2.4. Line Managers

Line Managers should be satisfied that any expenditure incurred on hospitality, gifts and events is in the best interests of the organisation, provides value for money and complies with current policies and procedures. Line Managers should ensure that all staff are familiar with current policy.

2.5. Employees

Employees must not use public resources for personal benefit or provide services to a third party that may be seen to compromise their judgment or integrity. Care should be taken to avoid actual, or potential conflicts of interests, real or perceived, when employing consultants and procuring goods and services.

2.6. Approving and Authorising Officers

Approving Officers are reminded of their responsibility for ensuring adherence to this policy.

It is important that the Accounting Officer has a defence against charges that the level of hospitality, gifts or events is excessive or that PBNI's staff are being entertained at the taxpayer's 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.

Officers authorising payments are reminded of their responsibility to ensure that the hospitality extended be properly approved.

2.7. Internal Audit

Internal Audit's role in the monitoring of compliance against policy and procedure forms part of the overall assurance that management will seek to obtain. Additionally Internal Audit is available to provide advice and guidance on matters relating to the provision of hospitality, gifts and events.

3. Authorising expenditure on Hospitality, Catering and Events

3.1. The Chief Executive has delegated responsibility for authorising expenditure on hospitality, catering and events to the Directors up to a limit of £300. They in turn may authorise expenditure recommended by their Assistant Directors or Heads of Department.

3.2. **Annex 1** provides details of the situations when prior approval needs to be obtained from the Chief Executive.

- 3.3. It is the responsibility of the individual business unit organising the activity to obtain the necessary approval.
- 3.4. When considering requests for official hospitality of people outside the public service, the Authorising Officers should apply the following considerations:
- a) the function must be in the direct, though not necessarily the immediate, interests of PBNI;
 - b) where PBNI officials participate in the entertainment as hosts, their numbers should be kept to the minimum necessary. Normally the outside (non-PBNI) guests should outnumber the hosts, though occasionally equal numbers of officials and guests may be appropriate. Where exceptionally it is proposed that the number of officials present should exceed the number of outsiders, prior approval must be obtained from the Chief Executive as per **Annex 1**.

4. Approval form

- 4.1. A pro-forma approval form is included in **Annex 2**. This should be completed for all hospitality, catering and events where the cost is expected to exceed £100. The pro-forma must be approved at a level not below Director or equivalent prior to any expenditure being incurred and retained by the business unit organising the event for the purposes of subsequent audit inspection.
- 4.2. The business unit will also need to obtain approval from the Chief Executive for expenditure greater than £300 and for situations outlined in **Annex 1**.
- 4.3. In addition, PBNI must also obtain prior approval from the Department of Justice for all hospitality, catering and events where the cost is expected to be £2,000 or greater.
- 4.4. This pro-forma approval form is not required in circumstances where the cost of meals or refreshments is already built-in to the price for a training course, conference etc. provided by a third party.

5. Management Hospitality

- 5.1 Strictly limited hospitality for fellow public servants at public expense is allowed on special occasions or for special purposes. Authorising Officers at a level not below Director may approve expenditure on management hospitality up to a limit of £5.25 per head. Prior approval must be sought from the Chief Executive as per **Annex 1** for any expenditure outside this delegated limit.
- 5.2 Approval should only be given only when it is regarded as conducive to good management and examples might include:

- a) working lunches to carry forward departmental business either internally or with representatives of other Government bodies;
- b) meetings with outside bodies and agencies or overseas visitors and guests; or
- c) the provision of refreshment to enable a senior official or Board member to meet junior staff informally in the interests of better communication.

5.3 Management hospitality must always be used sparingly and at modest cost, using public sector facilities whenever possible.

6. GENERAL MEETINGS

6.1 It is sometimes necessary for officials to host morning or afternoon meetings to which representatives of other Departments, civil servants in an unofficial capacity (e.g. Trade Union representatives) or persons outside PBNI are asked to attend. The provision of tea/coffee and biscuits/scones/fruit at PBNI expense at meetings of this kind is permissible.

6.2 Modest catering may also be provided at internal meetings to facilitate business needs if it is considered to be cost effective and in the interests of efficiency.

7 Working Lunches

7.1 Where it is simply not possible to accommodate urgent meetings, other than during lunchtime, staff at Director and above may consider it cost effective and in the interests of efficiency to provide a modest snack/lunch for staff with costs kept to a minimum. This might typically involve sandwiches/finger buffet, fruit/yoghurt and tea/coffee.

7.2 Where lunchtime meetings require the provision of refreshments, the cost per person should not exceed the values in section 8.2 of this guidance, except in exceptional circumstances, in which prior approval will be required, as per **Annex 1**.

8. Service User Programmes

8.1 The provision of tea/coffee and biscuits/fruit at PBNI expense at morning or afternoon programmes is permissible.

8.2 Lunch may be provided if necessary to facilitate the running of full day programmes. The cost per person should not exceed the values in section 10.2 of this guidance, except in exceptional circumstances, in which case prior approval will be required, as per **Annex 1**.

9. Internal Training Courses, Development Days and External Conferences, Seminars and Workshops

- 9.1 In general, the provision of meals and refreshments in these circumstances should be reasonable and should not exceed the values in section 10.2 of this guidance, except in exceptional circumstances, in which prior approval will be required, as per **Annex 1**.
- 9.2 Where it is convenient, a staff canteen should be used to allow a break for participants – in these instances the participants should pay for their own refreshments.
- 9.3 Where a staff canteen is not available, refreshments provided at morning or afternoon sessions should be limited to tea/coffee and scones/biscuits/fruit. Lunch may be provided if it facilitates the running of the course.

10. Dining – internal and external venues

- 10.1 Internal conference and dining facilities should be considered as a first choice for entertaining guests, particularly when numbers are relatively small. For example, conference rooms or boardrooms in Government buildings should be used if available, and consideration should be given to providing sandwiches or a snack meal from a Departmental canteen or local caterer.
- 10.2 In order to ensure value for money, catering services provided internally should fall within the following standard price ranges:
- a) management hospitality £5.25 per head;
 - b) working lunches £5.25 per head
 - c) training courses and conferences - finger buffet £5.25 per head;
 - d) formal breakfast or lunch £12.50 per head;
 - e) formal evening meal £25.00 per head
- 10.3 These figures do not include the cost of any drinks and the normal expectation is that alcoholic drinks should only be provided at PBNI expense for evening meals.
- 10.4 Unless there are compelling circumstances, such as the availability of particular facilities, expensive hotels and restaurants should be avoided when entertaining guests and, if available, a fixed or limited choice menu at a set price should be selected.
- 10.5 When guests are entertained externally at hotels, restaurants or similar venues, the total cost per head including meal, refreshments and any service charge or tip should be within the following financial limits:
- a) Lunch - up to a maximum of £15.00 per head; and
 - b) Dinner - up to a maximum of £35.00 per head.
- 10.6 In normal circumstances reimbursement of expenditure for alcohol will only be permitted up to one-third of the total cost involved.

11. Promotion and Recruitment Board Panel Members

11.1 Light refreshments consisting of tea/coffee and biscuits/scones/fruit may be provided to recruitment or promotion board panel members. Separate written approval is not necessary in these circumstances.

11.2 It is recommended that members of panels should not normally be provided with lunch, but each case should be considered separately, taking into account factors like time constraints prohibiting the panel taking lunch or the panel including an outside assessor.

12. Farewell Parties

12.1 Farewell parties for civil or other public servants may not be funded from public funds and all such occasions should be treated as private ventures. This remains the position whether or not a proportion of the guests are “outsiders”.

13. Authorising expenditure on Official Gifts

13.1 Gifts of a trivial or inexpensive nature (not greater than £10) can be provided and examples of this would include pens or other stationery provided at training events which promote the work of PBNI.

13.2 Official gifts should not be regarded as part of the normal conduct of PBNI business - gifts to members of staff or officials within PBNI would not usually be deemed to fall within normal conduct. It may be the case though that some form of acknowledgement or recognition should be provided e.g. to a person outside PBNI who has presented a seminar without charging a fee.

13.3 In these circumstances, it may be appropriate to provide a modest gift up to a maximum value of £50 per individual or group of individuals but prior approval for doing so must be sought from the Director of the business area making the gift using the approval form in **Annex 4**.

13.4 For gifts costing more than £50, the approval of the Chief Executive is required (approval form **Annex 4**).

13.5 Prior approval must also be obtained from the Department of Finance (DOF), where the cost of the proposed gift exceeds £100. This is in line with PBNI's delegations from the Department of Justice and the standard approval form for exceeding delegations should be used.

14. General rules

14.1 Tobacco products should not be provided from public funds under any circumstances.

- 14.2 Alcohol should not normally be provided for lunches or other daytime activities. For evening dinner or events, it is permissible to provide alcohol at a reasonable level and cost. In normal circumstances reimbursement of expenditure for alcohol will only be permitted up to one-third of the total cost involved.
- 14.3 If a service charge is not included in the restaurant or hotel bill, a tip of up to 10% is reasonable but this should be kept within the maximum costs specified at point 8.5.
- 14.4 Procurement Policy for expenditure on goods and services in respect of quotations etc. applies equally to hospitality, catering and events expenditure.
- 14.5 No spouses, partners or other associates of PBNI officials should receive official hospitality other than in exceptional circumstances with the specific agreement of the Chief Executive.
- 14.6 Staff should not claim any subsistence allowance where lunch, dinner, refreshment etc. has been provided at public expense.
- 14.7 Speakers and distinguished guests at conferences and courses may be invited to lunch and/or dinner, including drinks, at PBNI expense. However, an official who is attending other than as organiser or host will not normally be reimbursed for any hospitality which he/she offers at such a function.
- 14.8 Public funds should not be used to provide hospitality for visits to theatres, sporting events or other forms of public entertainment.
- 14.9 Gifts or hospitality of any kind should not normally be provided to companies or suppliers by anyone involved in the procurement or monitoring of a contract. However, where there is a long-term relationship with a supplier on a partnership basis, it is acceptable to offer occasional hospitality where this can be justified in the interests of the Department.

15. Situations not covered

- 15.1 It is recognised that there may be cases where, in the interests of PBNI, flexibility in interpretation of the strict rules may be necessary. However, prior approval for such situations must be obtained in writing from the Chief Executive as per **Annex 1**.
- 15.2 In addition to the normal information required, the request should clearly detail:
- a) why the request falls outside the boundaries of what is normally allowable;
 - b) why it is considered necessary to provide such hospitality;
 - c) how it will directly benefit PBNI; and

d) the expected consequences of the request being refused.

16. Classification and Identification of Hospitality, Catering and Events Expenditure

16.1 All invoices submitted for payment must include the following information clearly identified:

- a) whether it is hospitality, catering, conference, etc.;
- b) the purpose of the event;
- c) the names of people who attended.

16.2 Credit/debit card receipts on their own do not represent adequate audit evidence to support the expenditure incurred. Invoices from suppliers must always be submitted to confirm the split between food and alcohol.

16.3 Hospitality expenditure must be separately identified in PBNI's accounts for reporting purposes and therefore should not be coded to other areas such as general expenses.

17 Further Guidance

17.1 An Easy Reference Table designed to support these procedures and guidance is provided at Annex 5.

17.2 If you have any questions or require clarification on these procedures and guidance please contact the PBNI Head of Finance.

PRIOR APPROVAL

Prior approval must be sought from the **Chief Executive** in the following circumstances before incurring expenditure.

Guidelines applying to Officials

- I. **Official Hospitality, Catering & Events** – this includes situations where :
 - the estimated cost of the function is greater than £300;
 - the number of PBNI officials exceeds the number of guests; or
 - spouses, partners or other associates of PBNI officials are to be invited but excluding Secretary of State’s Christmas and Summer receptions for example.

- II. **Value for money** – where the proposed expenditure exceeds the recommended levels contained within Section 8.2 of the guidance e.g. £5.25 per head for management hospitality.

- III. **Gifts** - where the cost of the proposed gift exceeds £50 per individual or group of individuals. DOF approval is also required if the gift costs more than £100.

- IV. There is any **doubt** about the application of this guidance, **flexibility** in interpretation of the strict rules may be necessary or involves situations which are **not covered** by the existing guidelines.

In addition, PBNI must obtain prior approval from DOJ sponsor division within DOJ for hospitality, catering and events where the cost is expected to be £2,000 or greater.

ANNEX 2

PROBATION BOARD FOR NORTHERN IRELAND	
APPROVAL FORM FOR HOSPITALITY, CATERING AND EVENTS COSTING MORE THAN £100	
Department/Team	
Name of person requesting approval: (AD or Head of Department)	
Telephone number / extension:	
Date request submitted:	
Type of function i.e. Hospitality; Catering; Event	
Cost Centre to be charged – code and description:	
Date of function:	
Time of function:	From: To:
Venue/location of function:	
Total number of people attending:	
Number of external visitors and employing organisation(s) – see Note 3 below:	
Nature of hospitality or catering to be provided:	
Reason for expenditure i.e. what is the purpose of the event and what are the expected benefits to PBNI	
Total estimated cost – see attached sheet (Annex 3)	
<u>APPROVAL</u>	

Hospitality, catering & events expenditure between £100 - £299 OR Any Formal Dining OR Any Management Hospitality OR Any Working Lunches OR Any Events Approved by Director	Signed: Date:
Hospitality, catering & events expenditure £300 or greater OR Situations detailed in Annex 2 Approved by Chief Executive	Signed: Date:
Hospitality, catering & events expenditure greater than £2,000 Approved by DOJ – see note 4 below	Signed: Date:

1 - Further information should be provided on additional schedules if it is considered necessary for the full and proper understanding of the request.

2 - This form should be retained by the business unit organising the event for the purposes of subsequent audit inspection.

3 - Names of individuals or organisations may be omitted if essential for security reasons – a statement to this effect should be entered instead.

4 – For expenditure greater than £2,000: Once the proposal has been approved by the Chief Executive, it is the responsibility of the organiser to submit this form together with a covering letter to the Department of Justice sponsor division seeking approval before any expenditure is incurred.

ANNEX 3

PROBATION BOARD FOR NORTHERN IRELAND	
BREAKDOWN OF COSTS FOR HOSPITALITY, CATERING & EVENTS COSTING MORE THAN £100	
Department or Team:	
Name of person requesting approval:	
ITEM	£
Room hire	
Hotel and accommodation costs	
Food	
Beverages	
Alcohol	
Event management	
Travel and subsistence	
Printing and stationery	
Gifts (separate DOF approval required if greater than £100)	
Other – please specify	
TOTAL	

ANNEX 4

PROBATION BOARD FOR NORTHERN IRELAND	
APPROVAL FORM FOR GIFTS COSTING MORE THAN £10	
Department/Team	
Name of person requesting approval:	
Telephone number / extension:	
Date request submitted:	
Details of Gift	
Value of Gift	
Cost Centre to be charged – code and description:	
Reason for gift i.e. what is the purpose of the gift and what are the expected benefits to the PBNI	
Gifts between £10 - £50	Signed:
Approved by Director	Date:
Gifts between £50 - £100	Signed:
Approved by Chief Executive	Date:
Gifts over £100	Signed:
Approved by DOF (standard approval form for exceeding delegated limits should be used)	Date:

1 - Further information should be provided on additional schedules if it is considered necessary for the full and proper understanding of the request.

2 - This form should be retained by the business unit organising the event for the purposes of subsequent audit inspection.

3 - Names of individuals or organisations may be omitted if essential for security reasons – a statement to this effect should be entered instead.

PBNI
Provision of Hospitality, Gifts and Events
Easy Reference Table

ANNEX 5

Type	Definition	Examples	Guidance	Cost per Head	Delegated Limits	Approval Required
HOSPITALITY	Meals, drinks, refreshments & entertainment to one or more external party					
Formal Dining - internal	Formal dining for one or more external parties using an internal venue	Entertaining small numbers of external guests using conference rooms or boardrooms and local catering	Internal facilities should be considered the first choice for entertaining guests NB. Alcoholic drinks at PBNI expense for evening meals only	Cost per head (excl refreshments) should be within the following limits: Breakfast or Lunch up to £12.50 per head Evening meal £25.00 up to per head	TOTAL COST up to £300 (within cost per head limits) £300 to £2000 (or outside cost per head limits) Over £2000	Director Chief Executive DOJ
Formal Dining - external	Formal dining for one or more external parties at hotels, restaurants or similar venues		Expensive hotels and restaurants should be avoided unless there are compelling circumstances. Where possible a fixed price or limited choice menu should be selected For evening meals it is permissible to provide alcohol at a reasonable level and cost up to one-third of total cost involved.	Cost per head (including meal, refreshments and any service charge/tip) should be within the following limits: Lunch up to £15.00 per head Evening meal up to £35.00 per head	TOTAL COST As above	As above

**Provision of Hospitality, Gifts and Events
Easy Reference Table**

Type	Definition	Examples	Guidance	Cost per Head	Delegated Limits	Approval Required
Management Hospitality (Informal)	Limited hospitality for fellow public servants (delivered internally)	Working lunches external Meetings with outside bodies/agencies/overseas visitors/guests Senior officials/ Board members meeting junior staff informally	Allowed on special occasions or for special purposes (when regarded as conducive to good management) Should be used sparingly at modest cost using public sector facilities where possible	Up to £5.25 per head	TOTAL COST up to £300 (within cost per head limits) £300 to £2000 (or outside cost per head limits) Over £2000	Director Chief Executive DOJ
General Meetings	Morning or afternoon meetings with external parties	Meetings with other Departments Meetings with civil servants in an unofficial capacity (eg. Trade Union Reps)	Provision of tea/coffee and biscuits/scones/fruit permissible		TOTAL COST Up to £100 £100 to £300	AD/HoD Director

PBNI
Provision of Hospitality, Gifts and Events
Easy Reference Table

ANNEX 5

Type	Definition	Examples	Guidance	Cost per Head	Delegated Limits	Approval Required
CATERING	Food or drink for internal meetings, training or service user programmes with no external parties (excl service users & trainers)					
Internal Meetings	Morning or afternoon meetings with PBNI parties only		Provision of tea/coffee and biscuits/scones/fruit permissible if considered cost effective and in interests of efficiency		TOTAL COST Up to £100 £100 to £300	AD/HoD Director
Working Lunches	For internal staff only	Sandwiches/ finger buffet, fruit/yoghurt, tea/coffee	Permissible to accommodate urgent meetings where considered cost effective and in interests of efficiency. Lunch should be modest and costs kept to minimum	Up to £5.25 per head	TOTAL COST up to £300 (within cost per head limits) £300 to £2000 (or outside cost per head limits) Over £2000	Director Chief Executive DOJ
Training & Development Workshops	For internal staff only	Training courses Business Planning Day	Where possible use should be made of staff canteen/kitchen and staff pay Where no facilities available, refreshments at morning or afternoon sessions limited to tea/coffee and scones/biscuits/fruit Lunch may be provided if it facilitates running of course	Up to £5.25 per head (lunch)	TOTAL COST up to £300 (within cost per head limits) £300 to £2000 (or outside cost per head limits) Over £2000	Director Chief Executive DOJ

Type	Definition	Examples	Guidance	Cost per Head	Delegated Limits	Approval Required
Service User Programmes	Programmes for Service Users		Provision of tea/coffee and biscuits/fruit permissible for half day programmes		TOTAL COST Up to £100	Office Manager
			Lunch may be provided if necessary to facilitate running of full day programmes	Up to £5.25 per head (lunch)	TOTAL COST Up to £100 (within cost per head limits) £100 to £300 (within cost per head limits)	AD/HoD Director
Promotion & Recruitment Board Panels	Members of Panels sitting to decide on Board Recruitment or Promotion		Light refreshments permissible eg. tea/coffee and scones/biscuits/fruit Not normally provided with lunch Separate written approval not necessary			
Farewell Parties	For civil or public servants		May not be funded from public funds and should be treated as private ventures regardless of whether a proportion of guests are external			

PBNI
Provision of Hospitality, Gifts and Events
Easy Reference Table

ANNEX 5

Type	Definition	Examples	Guidance	Cost per Head	Delegated Limits	Approval Required
EVENTS	Conferences, seminars, workshops organised by PBNI involving one or more external stakeholders					
Conferences, Seminars, Workshops	Involving one or more external stakeholders	PBNI Conferences CJI Seminar Policy consultation with stakeholders	Total Costs should be considered including catering, management, printed materials and event management costs Provision of meals and refreshments should be reasonable and not exceed cost per head values except in exceptional circumstances in which prior approval has been given by the Director	Up to £5.25 per head (finger buffet)	TOTAL COST up to £300 (within cost per head limits) £300 to £2000 (or outside cost per head limits) Over £2000	Director Chief Executive DOJ
GIFTS						
			Gifts of a trivial or inexpensive nature can be provided eg. pens, stationery Official Gifts not part of normal conduct May be appropriate to provide a modest gift to an external party as acknowledgement or recognition		Up to £10 per individual or group Up to £50 per individual or group £50 to £100 Over £100	None Director Chief Executive DOF