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Responsible for interpretation:	Board of Trustees

Hospitality, Travel and Expenses Policy

<p>Introduction</p>	<p>City St George's Students' Union (the Union) values its reputation for ethical behaviour and financial prudence. It is important that we have policies to guide staff when receiving hospitality or incurring expenses whilst on the Union business and to inform them of current legislation.</p> <p>This document is in four sections:</p> <ol style="list-style-type: none"> 1. General principles and guidelines. 2. The policy for hospitality or gift(s) funded by and or provided to the University, where the beneficiaries include staff. 3. The policy for travel on the University business, including overnight accommodation. 4. The policy for reimbursement of expenses.
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1. General principles and guidelines

<p>Scope</p>	<p>This policy applies to all staff (including sabbatical officers). The policy relates to relevant expenditure whether claimed as personal expenses, incurred using a union Credit card, paid by invoice or through an expense claim.</p>
<p>Anti-corruption and bribery policy</p>	<p>The Union recognises that any involvement in bribery will adversely reflect on its image and reputation, we therefore follow the University's anti-corruption and bribery policy: Anti-corruption and bribery policy.doc</p> <p>The Union absolutely prohibits the offering, giving, soliciting or the accepting of any bribe in whatever form to or from any person or company, public or private by any council member, staff, contractors, consultants, agents, overseas agents, external examiners, and any non-employee service providers engaged on the University business for whatever reason.</p> <p>The prevention, detection and reporting of bribery is the responsibility of all staff. To this end staff should be aware of the Public Interest Disclosure process at: Whistleblowing policy on the Union website.</p>
<p>Authorisation</p>	<p>Any hospitality must be authorised by the Budget Holder or, if the budget holder is taking part, the Budget Holder's line manager. Should the proposal exceed the expenditure limits, a request to deviate from the policy should be made to the CEO.</p> <p>The Budget Holder is responsible for ensuring an expense claim is appropriate and is fully justified.</p>
<p>Value for money</p>	<p>Employees are expected to behave responsibly when spending the Union's funds and to avoid expenditure which cannot be reasonably justified as good value expenses, necessary or pertinent to SU business.</p>

	<p>A value for money judgment should be made prior to the making of any payment (e.g. cheap flights to airports distant from the destination which require considerable onward travel or overnight stays might not offer value for money).</p>
Committing expenditure	<p>Any expenditure on travel, hospitality or gifts must follow the Union's purchasing procedures.</p> <p>Purchases/bookings must be justified, authorised, and receipted. They should preferably be made using direct payment by the Union. Where this is not possible the Union/personal credit/debit cards or cash may be used and receipts claimed via the expenses process.</p>
Health and Safety	<p>Any hospitality given or accepted must comply with the Union safety standards. Risk assessments of activities should be ratified with the Safety Officer.</p> <p>Staff intending any travel, especially outside the UK, should undertake a risk assessment.</p>
Compliance and ethical behaviour	<p>Budget Holders should monitor compliance with this policy, with particular focus on the appropriateness of the expenditure and delivery of value for money. Internal Audit may audit compliance.</p> <p>Staff are expected to take personal responsibility to obtain appropriate VAT receipts to support expense claims and credit card transactions, and to provide all information required to adequately support the claim or the transaction.</p>
Political contributions and donations to charities	<p>City St George's, University of London, receives funding from the Government and, along with all HEIs, is classified as a public body under the definitions of the Freedom of Information Act. City St George's is also a registered charity. Consequently, it is important that the institution's expenditure corresponds with the purposes for which funds are received. As SU staff are jointly employed by the university, they must abide by university rules.</p> <p>Payments that could be interpreted as Political contributions are not permitted. the Union will not make political contributions, financial or in-kind, to support a political cause.</p> <p>Financial contributions include both donations and loans. In-kind contributions include gifts or loans of property, provision of services, advertising or promotional activities endorsing a political party, purchase of tickets to fundraising events and contributions to research organisations or 'think-tanks' with close associations to a political party.</p> <p>It is also not accepted practice to make payments to other Charities.</p>

Taxable benefits	<p>Expenses must be shown to have been incurred ‘wholly, exclusively, and necessarily on the Union business’ otherwise they will be treated as a taxable benefit by HMRC. It is important to provide sufficient supporting documentation for expense claims, including receipts. Failure to justify claims could result in the expenditure being disclosed as a taxable expense, with the employee liable for any resulting tax charge.</p> <p>Items claimed as expenses that could be regarded as taxable benefits have to be disclosed to City St George’s as they arise. City St George’s are responsible for reporting to HMRC and the PAYE Settlement agreement they have with HMRC means that they pay any tax due on behalf of the employees.</p>
Tax implications of staff hospitality	<p>The University currently has in place a PAYE settlement agreement (PSA) which allows the employer to cover the liabilities on ‘staff events.’ Part of the University’s PSA currently covers Small Gifts and Staff Hospitality, as included in this policy. This means that the individual does not have to pick up the tax liability, via a P11D, but the University does.</p> <p>Any all-staff gathering such as the leaving parties and team building events allowed for in the policy, will attract a charge that is payable to the HMRC, of 88.8% of the cost. Therefore, the actual cost of these events can be almost double the amount allowed for in the policy because the tax liability is calculated and transferred to the relevant cost centres on a periodic basis.</p> <p>The HMRC will allow employers to arrange some annual staff events that are not treated as a benefit in kind. The HMRC will allow employers to arrange an annual staff event that is not treated as a benefit in kind in any way i.e. with no additional Tax. The annual limit is up to £150 per head and if the employer was to not exceed the £150 limit on one annual event, for example the Christmas Party, then potentially a second annual event may be available without an additional tax liability to City St George’s. This is only allowed if the combined amount per head doesn’t exceed £150. Please discuss any potential spend with the Finance department BEFORE incurring any financial commitment.</p>
Applicable legislation and regulations	<ol style="list-style-type: none"> 1. Prevention of Corruption Acts 1906 and 1916 2. Bribery Act 2010 (OECD Anti-Bribery Convention) 3. Nolan Committee Report – Standards in Public Life 4. HMRC Tax Liability 5. Corporate Manslaughter and Corporate Homicide Act 2007 6. Health & Safety at Work Act 1974

2. Hospitality Policy

<p>Overview</p>	<p>The purpose of the policy is to provide information on the following:</p> <p>The expectations and obligations for individuals providing hospitality in the Union's name; the occasions at which the provision of hospitality and/or gifts may be considered acceptable; the kinds of items and/or services and the pertinent circumstances in which they may be considered hospitality or gifts; and the funding limits for each hospitality or gift type.</p> <p>A moderate amount of expenditure on staff is deemed acceptable but should not be excessive.</p> <p>There should be a clear business justification for any hospitality or gift which is funded by City St George's or accepted by staff, which must meet the test of reasonableness, where reasonableness is defined as being appropriate for a recognisable business purpose.</p>
<p>Unacceptable hospitality and gifts</p>	<p>Due consideration should be given to accepting hospitality or gifts from suppliers, students, and others. Staff may not accept hospitality or gifts, irrespective of value, which might influence or be seen to influence an award of business (contract) or the use of the Union's assets, or to benefit personally, or benefit anyone/body connected to that person. Acceptable hospitality/gifts may become unacceptable due to timing, such as during a tendering exercise.</p> <p>Cash, gift certificates, weekend trips, holidays or any other high value hospitality or gifts may not be accepted under any circumstances. Any such offers made should be brought to the attention of the Head of Finance as soon as practicable.</p>
<p>Hospitality and gifts acceptance</p>	<p>Hospitality and gifts should be logged in a hospitality register, held by the Finance Department.</p> <p>Any gift retained by a member of staff with the exception of low value items (<£25), will be deemed to be of the same status as a bribe retained.</p> <p>Occasional business lunches or hospitality and invitations to outside events may be accepted when appropriate. If the invitation is deemed to be generous, it should be logged in the register of interests.</p> <p>Offers of extended hospitality (e.g. hospitality at a sports event) from a vendor or potential vendor should be referred to the Head of Finance before any consideration of acceptance.</p>
<p>Gifts for staff</p>	<p>If gifts are purchased for visitors or members of staff, details of the recipient and reason for the gift should be provided on the</p>

	<p>expense claim or Credit Card transaction detail. Gifts for staff will be treated as a taxable benefit.</p> <p>Gifts and cards for members of staff should not be purchased from Union funds, with the exception of notable events such as births, deaths, serious illness, or notable birthdays.</p>
Staff meals and refreshments	<p>When staff meet together to discuss business either internally or externally, meals or drinks may not be claimed as expenses or paid for using a Union credit card. Likewise, the costs of outings to welcome new starters or send off leavers should not be claimed.</p>
Internal hospitality for meetings	<p>Internal hospitality such as lunch or refreshments etc. should not be arranged for meetings of less than two hours. When arranged it should be used sparingly and approved by the budget holder.</p> <p>Food can only be provided when it is necessary to hold a meeting during a normal mealtime (breakfast - before 9.00am, lunchtime - between 12.00 and 2.00pm, or evening - after 6.00pm), and it is not practical to expect staff to bring their own food. No alcohol can be provided. Where possible, such meetings should be held on City St George's premises and food provided by City St George's catering providers.</p>
Allowable hospitality expenses	
Staff hospitality and taxable benefits	<p>The cost of entertaining customers, suppliers or business contacts is deemed to be a normal business expense. There must not be a ratio of greater than 2:1 staff to external contacts, as the cost of the meals of additional members of staff is treated as a taxable benefit.</p> <p>The policy rules and the taxable benefits also apply to similar expenditure paid for using a credit card.</p> <p>If a team or department wish to arrange a team building event, this should be held on site to minimise the costs. Should there be good reason to go off site to partake in an activity, the cost of the event should take into the account value for money and the additional costs of staff only hospitality, which is a taxable benefit. A maximum allowance of £15/head should be used as a guideline. Arrangements and budget must be cleared with the Finance team in advance.</p>
Student events	<p>Claims for entertaining groups of students or alumni should be supported with records of amounts spent, the reasons for the entertainment, and the numbers of students and/or alumni present.</p> <p>The ratio of staff to students and/or alumni must not exceed 2:1. If it does, the cost will be treated as a taxable benefit.</p>

3. Travel Policy

Overview	<p>The policy covers all travel on SU business including overnight accommodation. The purpose is to achieve travellers' service requirements in the most convenient, cost-effective, and environmentally friendly manner, with safety an important consideration.</p> <p>The policy applies to all staff spending SU funds on travel and associated expenses regardless of the origin of the funding.</p>
External Funding	Travel and/or accommodation costs borne by other external parties where the source is not a research contract or similar should be recorded in the register of interests.
Authorisation	All travel should be agreed in advance with the Budget Holder. All overseas travel requires a Health and Safety risk assessment.
Allowable travel and subsistence expenses	
Air Travel	<p>Economy class should be booked for all flights under six hours duration.</p> <p>Premium economy must not be booked for flights lasting less than 6 hours</p>
Use of own vehicle and claiming mileage	<p>Public transport should be used wherever possible.</p> <p>Private car usage must be pre-authorized, the car must be road worthy, reliable, presentable, and insured for "business use".</p> <p>Mileage can be claimed at the rate of £0.45 per mile up to 10,000 miles, thereafter £0.25 per mile (due to HMRC regulations).</p> <p>The London Congestion Charge (or similar) is not claimable unless it is absolutely essential to bring a car into the charging zone.</p>
Hire Cars	Hire cars should normally be used unless it is considerably cheaper to use a private vehicle than to use other means of transport.
Public Transport	Staff should travel standard class. Use of public transport in London: The cost of a journey can be claimed and must be supported by receipts or journey transactions
Taxis	<p>Taxis should only be used where there is genuinely no public transport alternative or staff are transporting equipment or are required to travel late at night (after 10.00pm) or early in the morning (before 6.30am).</p> <p>Claims exceeding £20.00 require justification. Taxi fares must be receipted.</p>

Home to work	Home to work/work to home is not reclaimable in the normal course of business. On rare occasions it may be claimed where a member of staff has temporary mobility problems. This should be approved in advance.
Hotels	All staff are expected to keep value for money in mind when sourcing overnight accommodation, utilizing the cheapest room option in a chosen venue.
Subsistence	<p>Meals can be claimed while away on SU business up to the following maximum limits. Values include VAT and any local taxes:</p> <ul style="list-style-type: none"> • Breakfast: £10.00 when consumed during business travel or a home departure prior to 06:00 • Lunch: £15.00 • Evening Meal: £27.50 can be claimed for overnight stays or home returns after 20:00 following a business trip. <p>Budget Holders can set a daily allowance using the limits above – provided that the timings are adhered to. The following may not be included in subsistence claims:</p> <ul style="list-style-type: none"> • Personal telephone calls. • Entertainment unless approved in advance. • Meals consumed by a family member or friend.
Other Travel related costs	Internet connection costs and visas are allowable expenses.
Incidentals	<p>Nightly Incidental expenses can be claimed as follows:</p> <ul style="list-style-type: none"> • £5.00 in UK • £10.00 outside the UK <p>This is a fixed rate to cover personal phone calls, coffee in transit, newspapers. No receipt will be required unless the expenditure is charged to a research grant.</p>

4. Expenses Policy

Overview	Claims will be met where the expenses are shown to have been properly and necessarily incurred on behalf of the Union. Before incurring any expense, staff should obtain approval for the expenditure from the relevant budget holder. Staff are encouraged to use the normal ordering procedures or Credit Cards to avoid expense claims wherever possible.
Claiming and approving expenses	<p>All claims will be reviewed by an approver, who will mostly be the Budget Holder or their line manager. The approver is responsible for confirming that the claim is appropriate against the cost centre and nominal code being used. When approved the claim will be passed on to the Finance office to be checked against the receipts.</p> <p>Scanned receipts can be accepted.</p>

Reimbursement of expenses	<p>Claims must be submitted promptly, preferably on a monthly basis and certainly within three months of the expenditure being incurred.</p> <p>Receipts will be matched to claims by Finance before claims are paid. Reimbursements will be made via a BACS on a weekly basis.</p>
Allowable expenses (not covered in Sections 2 and 3)	
Phone costs	Essential business phone calls or connections to the network may be claimed through the expenses process. Claims have to be supported by an itemised bill that shows which are the business calls. The cost of mobile phone top-up payments/vouchers can also be claimed if purchased for business use.
Professional Subscriptions	The cost of an annual subscription to a Professional body that is relevant to the role being undertaken, can be claimed subject to the local rule applied by the School or Professional Service. This is limited to only one such subscription per person per annum.
Office related costs	Office items and IT equipment must be obtained via the purchasing route. This expense option is available for low value items purchased while travelling, e.g. postage, print facilities or items that have to be purchased by the individual such as apps for iPads.