

<b>Date Issued</b>	August 1996
<b>Last Reviewed</b>	March 2021
<b>Department</b>	Corporate
<b>Title</b>	<b>Gifts and Hospitality Policy</b>
<b>Objective</b>	To describe our arrangements for accepting and recording gifts and hospitality
<b>Responsible</b>	Chief Executive
<b>Review Date</b>	March 2026

## 1.0 INTRODUCTION

- 1.1 We recognise that the giving or receiving of gifts or hospitality is a common practice, but that it is important to demonstrate that in every area of activity the Management Committee and staff are clearly seen to be acting fairly, honestly and with 'probity'.
- 1.2 The policy also aims to ensure that conduct in relation to gifts and hospitality is compliant with the Bribery Act 2010, offenses under which can be punished by a prison term of up to 10 years. Similar policies exist across the public sector.
- 1.3 Committee Members and employees should always regard with caution any offer of favour or hospitality that is made to them personally.
- 1.4 As a general rule, individuals should not accept personal gifts other than those of minor value or of a trivial nature, nor allow extravagance in any entertainment received or given.
- 1.5 We recognise that there is a significant difference between small gifts and modest hospitality rendered as a genuine expression of appreciation - where no-one would wish to offend the giver - and those which may be interpreted as an inducement to influence business decisions.
- 1.6 Any gifts or offer of hospitality which may be regarded purely as an inducement to secure our business will be rejected, and the approach will be immediately reported to the Chief Executive (or Chairman in the case of the Chief Executive).
- 1.7 Any breach of these procedures by an employee will be dealt with in accordance with our disciplinary procedures.

Any breach of these procedures by a Management Committee Member may result in an investigation being launched, in line with the Management Committee Member's Code of Conduct.

## **2.0 GIFTS**

### **Receipt of Gifts**

- 2.1 All gifts received by the Association as a corporate body, or by an individual Management Committee Member or staff member will be reported to the Chief Executive (or Chairman in the case of the Chief Executive). The details, ie donor; recipient (including final destination); description; approximate value, will be recorded in the Gifts & Hospitality Register.

The only gifts exempted from this rule will be items of small value - defined as costing up to £25.00 in total - such as flowers, diaries, calendars, boxes of chocolates etc. A list of permitted gifts can be found in Appendix A of the Entitlements, Payments and Benefits Policy.

- 2.2 If the Chief Executive (Chairman) decides that the gift might constitute a bribe or other inducement, the gift will be returned to the donor with a covering letter explaining that the gift cannot be accepted as it falls outwith our policy on receipt of gifts.

Examples of such gifts are cash, other payments, holidays or substantial items.

- 2.3 If the gift is clearly made as a token of the donor's gratitude for a service carried out to a very high standard and the value is not greater than £25.00, the details will be recorded and the recipient will be allowed to keep the gift.
- 2.4 Gifts which are acceptable and which are not being retained by the individual concerned will be received on the clear understanding that they will be donated to charity or will form part of our annual charity fund raising activities.

### **Giving Gifts**

- 2.5 We will normally only consider giving gifts in the following circumstances:
- when someone carries out work or provides a valuable service voluntarily or for a nominal fee;
  - as a gesture of appreciation or sympathy, for example:
    - on the death of a Committee Member or employee;
    - to mark the retirement or long service of a Committee Member or employee;
    - the terminal or serious illness of a Committee Member or employee.

2.6 All proposals to make a gift will be submitted to the Chief Executive and will include the following details:

- who the gift is for
- why it should be given
- the nature of the gift
- the approximate value of the gift

2.7 The Chief Executive has delegated authority to approve gifts up to £25.00 in value. The Management Committee must approve gifts above this value.

2.8 Details of all gifts given will be recorded in the Gifts & Hospitality Register.

### **3.0 HOSPITALITY**

#### **Receiving Hospitality**

3.1 Invitations from business associates, Consultants, Contractors or other suppliers, will be regarded as acceptable hospitality provided that the frequency and scale of such lunches would be regarded as normal given the scale of the business concerned, eg business lunch; official opening; special promotion or event attended by a range of other (potential) clients or customers and does not exceed £50.00 Prior approval is sought from the Management Committee for any invitation with a value that is greater than £50.

Any Management Committee Member or staff member who becomes concerned about the scale of hospitality being offered should consult the Chief Executive (or Chairman as appropriate) prior to accepting.

3.2 The details of all hospitality received, ie who from, who to, nature of hospitality, approximate value; will be recorded in the Register of Gifts and Hospitality.

#### **Giving Hospitality**

3.3 All proposals for the provision of hospitality by the Management Committee, an individual Management Committee Member or a member of staff (normally only members of the Management Team), will be with the agreement of the Chief Executive. If the proposed value of the hospitality is over £100, the Chief Executive will consult with the Chairman.

3.4 If the decision is to offer the hospitality, the details will be recorded in the Gifts and Hospitality Register, including:

- who the hospitality is for
- why it should be given

- the nature of the hospitality
- the proposed value/venue/date

3.5 Where the hospitality is to be provided by an individual, e.g. business lunch, appropriate receipts must be produced along with the expenses claim form prior to reimbursement being made. Payment for corporate hospitality will normally be made direct to the supplier(s).

## 4.0 RETIRAL/LONG SERVICE AWARD POLICY

### 4.1 Introduction

We recognise the contribution made by staff to our success. We want to ensure that we recognise and mark loyal service, and therefore have set out awards that apply to all staff leaving us who have built up more than 5 years service with us, in accordance with EVH recommendations, and contained within our terms and conditions of employment.

### 4.2 Awards

The following arrangements will apply (subject to the agreement of the staff member concerned). These awards are designed to supplement and support any arrangements which members of staff make on the retirement / resignation of a colleague.

We will:

- Meet the catering costs of all presentation functions for staff with 5 or more years service. This provision is designed to cover the cost of a traditional workplace presentation (tea/coffee/cakes etc).
- In addition, we will make a corporate contribution to a retirement / leaving gift based on the employee's length of service with us as follows:
  - **5 – 10 years service: £100.00**
  - **10 – 15 years service: £125.00**
  - **15 – 20 years service: £175.00**
  - **Over 20 years service: £225.00**
- We will respect our staff member's wishes in all cases, and if they prefer, our contribution can be used to help fund a more elaborate function away from our office.
- At least one member of the Management Committee will be asked to attend all such presentations where these are held in our office. Where invited to do so, a Management Committee member will take part in any presentation.

#### 4.3 Scope

The above arrangements will apply to all categories of staff regardless of grade, and to all retirees including those which are on the grounds of ill health.

### 5.0 PARTIES & CELEBRATIONS

5.1 In arranging parties (e.g. Christmas parties), special functions or anniversary events, the costs of which are partly or wholly being met by us, and in accordance with our Entitlements, Payments and Benefits Policy, we will ensure that:

- all participants in the event will be entitled to exactly the same 'benefits', with no preference being shown to any individual
- the arrangements and a budget for the event have been approved beforehand by the Management Committee

5.2 Where appropriate, we may choose to seek sponsorship for such events.

### 6.0 MONITORING AND REVIEW

6.1 The Chief Executive will ensure that all relevant details are entered into the Gifts & Hospitality Register.

6.2 The Chief Executive will submit an annual report to the Management Committee on the gifts and/or hospitality received or given, at their first meeting in the calendar year.

6.3 The Chief Executive will ensure that the Management Committee reviews this policy at least every five years.