SAMPLE POLICY

Gifts and Hospitality

Introduction
This Corporate Gifts and Hospitality Policy considers a number of areas including the purpose of corporate hospitality, conditions of use, and use of a register. This policy should apply to all members of the Board/Management Committee and all members of staff.

The conduct of staff and members must always be above any suspicion of impropriety or conflict of interest. As a consequence, they should never receive benefits of any kind from a third party which might reasonably be thought to compromise their personal judgement or integrity. In this field, perception is as important as reality.

The guidance also applies to spouses, partners or other associates, if it can be argued or if there is the possibility that the gift or hospitality could be perceived as benefiting the member of staff or Board.

Definitions
Gift: an item given, without the expectation of receiving anything in return and generally is made without pre-conditions. This can include items on permanent loans as well as the sale or lease of assets at less than market value.

Hospitality: is an offer of generosity from an external organisation, such as free lunches, dinners, holidays and other social events. These events include: team building days, invitations to sporting events, hospitality upgrade at a sporting event, high value events as well as activities that could give rise to a claim of negligence being pursued against the organisation. This list is not exhaustive.

Recipients
Corporate hospitality can be provided and/or received that is reasonable and proportionate to the needs of the organisation to generate and/or maintain good relations with potential stakeholders.

The general principle is that if a member of staff or Board has any doubt about the propriety of accepting a gift or hospitality then it should be refused.

Members of staff and/or Board should not do anything that may give the impression that they could be, or have been, influenced by a gift or consideration to show bias in any way while carrying out their official duties.
Acceptance of Gifts and/or Hospitality
The acceptance of what would be classified as conventional hospitality, for example working lunches, should, in the main, cause no problem provided that it is limited to isolated occasions. Prior approval is not required to accept this type of Hospitality.

Hospitality, which would not be acceptable, would include invitations to frequent or more expensive social functions where there is no direct link to official business (e.g. sporting events or the theatre), particularly where these come from the same source, and those which involve travel, hotel or other subsistence expenses.

There are occasions however where acceptance is allowed if attendance is justified. Examples would include:
- An invitation from an established or prospective organisation to a function that is part of a wider gathering;
- An invitation to attend a dinner or function of a Society or Institute with whom there is a historical relationship; or
- An invitation to attend a function organised as part of a company’s anniversary celebration.

A monthly Gifts & Hospitality Declaration should be distributed to staff for completion (Appendix 2).

The gift and/or hospitality should be detailed in the Notification of Gifts and Hospitality (Appendix 3) and recorded on the Register of Gifts and/or Hospitality (Appendix 4) whether accepted or not.

Procurement or monitoring of a contract
Apart from trivial/inexpensive seasonal gifts, no gifts or hospitality of ANY kind, from any source, should be accepted by anyone involved in the procurement or monitoring of a contract. This will ensure that no criticism can be made regarding bias to a particular company or supplier.

Conditions of use
Whether provided or received, any hospitality is restricted to the stakeholder/s to whom it was originally intended and that there is no right of re-sale to any third party.

When deciding whether prior approval from the Board or its designee should be sought before accepting hospitality and/or a gift the following must be considered:

- Is the gift trivial in value?
A trivial gift is one of nominal value where common sense dictates that there is a minimal risk of giving rise to an accusation of a conflict of interest. Such gifts include small perishable items, novelty items and items with a value of less than £/€50.
• Is the gift seasonal?
A seasonal calendar event increases the likelihood of an employee receiving a gift of a higher value than would be usually expected if that same item were given during a different time of the year. If such a gift is received and it is above £/€100 in value then it should be accepted on behalf of the organisation and the employee should seek post-acceptance permission as soon as is practicable.

• Might refusal offend?
Staff and board members should be mindful of any sensitivity that refusal of a gift may cause. If such an event occurs and the gift is above £/€100 in value then the gift should be accepted on behalf of the organisation and post-acceptance permission sought. Where it is reasonably considered that refusal may cause offence or where the value of a gift could not reasonably have foreseen.

• Is the gift frequently received?
Frequent gifts of any value give rise to future accusation of bias. Any gift which an employee reasonably believes they will receive on a regular basis should be submitted for prior approval.

• Is there any expectation that a gift will be received?
Previous accepted practice does not imply future good practice. All gifts should be subject to the same conditions as if received for the first time.

**Authorisation**
Any offer of corporate hospitality made to a Director or Employee should be submitted to the Chair/Chief Executive for consideration.

Failure to obtain any requisite approval may result in disciplinary or other action as appropriate under the Code of Conduct (for Managing Board members) or the individual contract of employment in the case of staff.

In the event of a breach by a director or employee, appropriate disciplinary action will be taken.

**Provision of Gifts and/or Hospitality**
**General Principles**
Provision of gifts and/or hospitality should not be regarded as part of the normal conduct of the organisation and should only be a modest expense.

**Provision of Gifts**
While it is essential to maintain and cultivate contacts with outside groups, members of staff the Board must bear in mind the principles of propriety and correctness when providing gifts of any value. A notional limit of £15 should be applied.

**Provision of Hospitality**
All expenditure on hospitality must be able to withstand both internal and external scrutiny. It should be value for money and incurred in accordance with the principles of regularity and propriety. The level of hospitality should not be excessive and it is a matter of judgement as to what is appropriate and reasonable in each circumstance.
What constitutes hospitality?
The following list provides some examples of what would be deemed as acceptable hospitality expenditure:

- Tea/coffee and biscuits/scones;
- Modest lunches provided at recruitment/assessment panels, external training courses, staff development days (only at external venue) or infrequent working lunches,
- Modest lunches provided at meetings with external stakeholders or events (including corporate events).
- The total cost of food and refreshment at residential courses should not exceed £30 per day.

Register of Gifts and Hospitality
A standard template (Appendix 4) should be completed to record gifts and/or hospitality which include the following details:

- Name of the proposed recipient(s);
- Type of gift/hospitality (a brief description);
- Estimated value (£/€);
- Name & address of donor;
- Date of offer;
- If offer was accepted or rejected;
- If accepted, confirmation that the necessary approval has been provided (if applicable);
- If rejected, statement by the Approving Officer as to why approval was not granted;
- Date & signature of proposed recipient; and
- Date & signature of the Approving Officer.

It should be noted the register is subject to Freedom of Information (FOI) queries when deciding on the acceptance of any gift or hospitality.

Summary
Each member of staff and the Board or Management Committee should be familiar with the terms and conditions set out in this policy.

Compliance with the policy is important to ensure that the type and magnitude of gifts/hospitality received/provided is consistent with normal expectations.

As the guidance cannot cover every eventuality, the advice of the Chair/Chief Executive should be sought in any case where the propriety of accepting/providing a particular gift or offer of hospitality is in doubt.

The Chair/Chief Executive should review expenditure on conventional hospitality during the year to ensure it is not excessive and the Register of Gifts and/or Hospitality on an annual basis for due compliance with this policy.

Sources:  
Sport Northern Ireland Gifts and Hospitality Policy 2013  
Bowls England Corporate Hospitality Policy 2011  
The Amateur Swimming Association Corporate Hospitality 2010  
The Consumer Council Hospitality and Gift Policy 2010
# Summary of Hospitality Rules

<table>
<thead>
<tr>
<th>Type of Hospitality</th>
<th>Rules</th>
<th>Required Action</th>
<th>Notify for Register</th>
</tr>
</thead>
<tbody>
<tr>
<td>Conventional Hospitality such as Lunches / Dinners</td>
<td>Normally acceptable if in the interests of the organisation, and in particular if lunches are part of meetings.</td>
<td>Record reason for attendance in advance and seek prior approval from line manager/Chair/Chief Executive. Should be used to promote the organisation’s business or as a learning exercise from host or similar businesses.</td>
<td>YES</td>
</tr>
<tr>
<td>Attendance at conferences and seminars at the invitation of current or prospective partners/stakeholders</td>
<td>Acceptable if in the interests of the organisation. These events can be of particular value where they support the establishment of relationships with strategic partners/stakeholders to the business or enhance the organisation’s knowledge or understanding of a particular area. For such events, the hospitality element should be incidental to the event.</td>
<td>Record reason for attendance in advance and seek prior approval from the Chair/Chief Executive. Should be used to promote the organisation or as a learning exercise from the event.</td>
<td>YES</td>
</tr>
<tr>
<td>Other Hospitality (particularly sporting and cultural events, and invitations overseas)</td>
<td>Acceptable only if the interests of the Company can be clearly demonstrated.</td>
<td>Record reason for attendance in advance and seek prior approval from the Chair/Chief Executive. Should be used to promote the organisation or as a learning exercise from similar organisations.</td>
<td>YES</td>
</tr>
<tr>
<td>Travel and accommodation, holidays and the use of vehicles.</td>
<td>Not acceptable.</td>
<td>Record in Register, by completing the notification form in Appendix 3.</td>
<td>YES</td>
</tr>
</tbody>
</table>
Gifts & Hospitality Declaration

Name:

Position:

Please sign either Statement A or B

**Statement A**

I confirm that I have **not** been offered any Gifts or Hospitality during the period 1 April 20xx to 31 March 20xx.

Signed ____________________  Date _______________

**Statement B**

I confirm that I have been offered (accepted or declined) Gifts and Hospitality during the period 1 April 20xx to 31 March 20xx and these are detailed on the attached forms.

Signed ____________________  Date _______________
## Notification of Gifts and Hospitality Offered to Board/Committee Members or Employees

<p>| | |</p>
<table>
<thead>
<tr>
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<tbody>
<tr>
<td>1</td>
<td>Name of proposed recipient(s)</td>
</tr>
<tr>
<td>2</td>
<td>Unit/Team</td>
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<tr>
<td>3</td>
<td>Type of Gift/Hospitality Offered (give a brief description – date, venue, type )</td>
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<tr>
<td>4</td>
<td>Estimated Value (£ Sterling)</td>
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<td>5</td>
<td>Name and Address of Donor</td>
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<td>6</td>
<td>Organisation Relationship with Donor</td>
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<td>7</td>
<td>Date of Offer</td>
</tr>
<tr>
<td>8</td>
<td>Purpose of Offer</td>
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<td>9</td>
<td>Is there a current/potential contract with donor? (Give details)</td>
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<tr>
<td>10</td>
<td>Was offer accepted or rejected?</td>
</tr>
<tr>
<td>11</td>
<td>If accepted, is approval required?</td>
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<tr>
<td>12</td>
<td>Is gift being returned?                      Has gift been used or disposed of? Has gift been donated to nominated charity? (Give details of the above)</td>
</tr>
<tr>
<td>13</td>
<td>Statement by Approving Officer detailing why approval has or has not been granted.</td>
</tr>
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### Signature of Recipient

........................................... Date: ..............

### Signature of Approving Officer

........................................... Date: ..............

Please ensure that the Gifts and Hospitality register has been updated by providing this form completed.

<table>
<thead>
<tr>
<th>Updated Register – Receptionist</th>
<th>(Signature/Date/Ref No.)</th>
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# Register of Gifts and/or Hospitality

<table>
<thead>
<tr>
<th>Description of Gift/Hospitality and reason for offer</th>
<th>Value (£/€)</th>
<th>Approval required if &gt; £/€50</th>
<th>Name of donor &amp; organisation</th>
<th>Date of offer</th>
<th>Details of any current/ potential contract</th>
<th>Offer accepted/rejected (reason)</th>
<th>Received by (Date)</th>
<th>Approved by (Date)</th>
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