



# GIFTS AND HOSPITALITY POLICY

| Approved By | Date                      | Next Review Due |
|-------------|---------------------------|-----------------|
|             | 12 <sup>th</sup> May 2017 | May 2018        |

| <b>Version</b> | <b>Amendment</b>                           | <b>Date</b>   |
|----------------|--|---------------|
| 0.1            | Draft Prepared by SG                       | December 2015 |
| 0.2            | Incorporation of Registered Charity number | December 2015 |
| 0.3            | Updates post Trustee meeting 15/1/2016     | January 2016  |
| 1.0            | Published Policy                           | January 2016  |
|                | Reviewed                                   | May 2017      |
|                |  |               |
|                |  |               |

## **The Institute for Research in Charity (IRIS)**

### **POLICY ON ACCEPTING GIFTS & HOSPITALITY**

#### **Why do we have guidance on gifts and hospitality?**

Your conduct as a member of staff or a trustee should never lead anyone to question your interests, or lead anyone to think that you have been influenced by gifts and hospitality. This is important because your own personal reputation and that of the Charity could be seriously affected if you inappropriately accept a gift or hospitality. It is also a criminal offence to demand or accept a gift or reward in return for allowing yourself to be influenced as a part of the Charity. This is why the Charity has guidance which applies to all staff and Trustees on gifts and hospitality.

#### **What is a gift?**

A gift is any item or service that you receive free of charge. It also includes any goods or services which you personally are offered at a discounted rate or on terms not available to the general public.

#### **What is hospitality?**

Hospitality is the offer of food, drink, accommodation or entertainment or the opportunity to attend any cultural or sporting event on terms not available to the general public.

#### **What gifts or hospitality can be accepted without any approval?**

You can accept gifts and hospitality, which are small gestures from an individual and have a value of £100 or less, without the approval of the Trustees. Gifts and hospitality of this nature do not need to be recorded in the Charity's Gifts and Hospitality Register. Reasonable effort needs to be made to approximate the value.

#### **What things should I think about before I decide what to do?**

You should treat with caution any offer of gift or hospitality made to you personally. In particular, think about whether there is a benefit to the Charity in you accepting, the scale, amount, frequency and source of the offer, the timing of the offer in relation to forthcoming decisions and whether accepting could be misinterpreted as a sign of your, or the Charity's, support or favour.

#### **What gifts or hospitality need approval from the Trustees?**

Any gift or hospitality which is more than just a token, defined as a having a value of more than £100, should be politely refused or returned. You must have the prior written approval of the Trustees, if you decide to accept something which has more than this value. This should only be in exceptional circumstances. If you or your director has any concerns or doubts about the public perception that might be attached to accepting any gift or hospitality, then you must refer it to the Chair of Trustees.

#### **What gifts or hospitality should never be accepted?**

You must never accept;

- cash or monetary gifts (excluding gift vouchers for the amounts shown above)
- gifts or hospitality offered to your husband, wife, partner, family member or friend
- gifts or hospitality from a potential supplier or tenderer in the immediate period before tenders are invited or during the tender process.
- Lavish or extravagant gifts or hospitality, even if they relate to activities in your own time.

### **What should I do if I receive a gift without warning?**

If you estimate that the gift is more than just a token you should politely and courteously decline the gift. If you feel that it would not be appropriate to do this, you should refer the matter to the Trustees as soon as possible and let the Chair of Trustees decide what you should do with the gift.

### **What should I do if I get offered a gift or hospitality?**

You must make sure that all offers you receive which have a value of more than £100 are recorded in the Charity's Gifts and Hospitality Register, which is kept in the Charity Office.

### **Do I need to record offers that I decline?**

Yes – *all* offers of gifts or hospitality, which have a value of more than £100, must be recorded in the Charity's register, even if you don't accept.

### **What should I do if I am in doubt?**

If in doubt, always speak to the Director of Operations/ Director. It is your responsibility to follow the Charity's guidance on gifts and hospitality and to justify why you chose to accept a gift or hospitality offered to you.

### **What would happen to me if I didn't follow the guidance?**

The Charity will take disciplinary action against you if you failed to follow the guidance. It is also a criminal offence to demand or accept a gift or reward in return for allowing yourself to be influenced as a part of the Charity. This means you could be prosecuted by the Police.

### **Giving gifts to Individuals**

Gifts for individuals, such as members of staff/Trustees leave or who are off work for a period of prolonged sickness, can be purchased to the limit of £100.

Gifts to anyone other than staff/Trustees outlined above must be approved by the Chair of Trustees..

## THE DO's and DON'T's

| DO  | DON'T   |
|---|---|
| <ul style="list-style-type: none"> <li>➤ Read and follow the guidance on gifts and hospitality</li> </ul>   | <ul style="list-style-type: none"> <li>➤ Accept any gifts or hospitality which have a value of more than £100 without the approval of the Trustees as necessary</li> </ul>  |
| <ul style="list-style-type: none"> <li>➤ Seek advice from the Director of Operations or Chair of Trustees if you are in doubt</li> </ul>  | <ul style="list-style-type: none"> <li>➤ Accept gifts or hospitality in the immediate period before tenders are invited or during the tender process.</li> </ul>  |
| <ul style="list-style-type: none"> <li>➤ Record all offers of gifts and hospitality which have a value of more than £100 in the Charity's register, whether accepted or not</li> </ul>                        | <ul style="list-style-type: none"> <li>➤ Accept cash or monetary gifts</li> </ul>   |
| <ul style="list-style-type: none"> <li>➤ Treat with caution any gifts or hospitality offered to you and think very carefully before accepting anything</li> </ul>   | <ul style="list-style-type: none"> <li>➤ Accept a gift or hospitality as an inducement or reward</li> </ul>   |
| <ul style="list-style-type: none"> <li>➤ Take into account what the public's perception would be in deciding whether or not to accept a gift or hospitality</li> </ul>  | <ul style="list-style-type: none"> <li>➤ Accept gifts or hospitality connected to your work, even if the hospitality is taken in your own time</li> </ul>   |
| <ul style="list-style-type: none"> <li>➤ Consider whether the offer is proportionate in deciding whether or not to accept hospitality from an outside body</li> </ul>   | <ul style="list-style-type: none"> <li>➤ Accept a gift or hospitality which you or a member of the public would think is lavish, extravagant or excessive, even if the hospitality is taken in your own time</li> </ul> |
| <ul style="list-style-type: none"> <li>➤ Err on the side of caution when deciding whether to accept a gift or hospitality. If the thought of the acceptance makes you uncomfortable, do not accept</li> </ul> | <ul style="list-style-type: none"> <li>➤ Accept gifts or hospitality offered to your husband, wife, partner, family member or friend</li> </ul>   |
| <ul style="list-style-type: none"> <li>➤ Consider paying for yourself if offered any hospitality by a supplier or third party</li> </ul>  |   |

**The Institute for Research in Schools Charity Number 1164654**

**RECORD OF GIFTS & HOSPITALITY (accepted\*/refused\*)**

\*Delete as appropriate

This form must be completed by any member of staff or trustee receiving or declining a gift or hospitality, which relates to their position in the Charity and has a value of more than £100 from an individual. The agreement from the Director of Operations or Chair of Trustees must be obtained in accordance with the Charity's guidance.

|  |  |
|--|--|
| <b>Name of staff/Trustee</b>   | <b>Position held</b>                               |
| <b>Individual, company or organisation offering gift or hospitality</b>  |  |
| <b>Date, time and venue</b>  | <b>Gift/Hospitality</b><br><br>Accepted*/Declined* |
| <b>Nature and approximate value of hospitality/gift.</b><br><br>If accepted, has the gift been retained for personal use or for Charity use? |  |
| <b>If accepted, reason for accepting hospitality/gift</b>  |  |
| Signed:  | Date   |
| Approved By:<br>(Director of Operations/ Chair of Trustees signature)  |  |

**PLEASE RETURN COMPLETED FORM TO THE CHARITY OFFICE FOR RETENTION ON THE GIFTS & HOSPITALITY REGISTER**

(Review 2017)

**RECORD OF GIFTS & HOSPITALITY GIVEN BY THE CHARITY**

This form must be completed by the Director of Operations/Chair of Trustees to authorise the giving of a gift or hospitality from the Charity.

|  |                         |
|--|-------------------------|
| <b>Name of staff/Trustee providing gift/hospitality</b>  | <b>Position held</b>    |
| <b>Date</b>  | <b>Gift/Hospitality</b> |
| <b>Nature and approximate value of hospitality/gift.</b> |                         |
| <b>Reason for giving hospitality/gift</b>                |                         |
| Signed:<br>Director of Operations/ Chair of Trustees     | Date:                   |

**PLEASE RETURN COMPLETED FORM TO THE CHARITY OFFICE FOR RETENTION ON THE GIFTS & HOSPITALITY REGISTER**

**(Review 2017)**