

Acceptance of Gifts and Hospitality

General Principles

The behaviour of directors and employees in the acceptance of gifts, rewards and hospitality should be governed by the following general guidance:

1. Directors and employees must not give or accept any gifts, rewards or hospitality as an inducement for doing something or not doing something in their capacity as an employee.
2. The guidance principle is that employees must not foster suspicion of any conflict with their duty as a director or employee and their private interest as outlined in the Conflicts of Interest Policy. Thus any gifts or hospitality must be refused if accepting it would contravene this principle.

In cases of doubt it should be clear who the employee or Members of the Board of Directors should consult *e.g. the Chief Executive, HR Director or Chair*.

Hospitality

Conventional hospitality, such as the occasional meal; a ticket to a public cultural, social or sporting event; or an invitation to the annual dinner of a national or international organisation or association, may be accepted provided that acceptance would not contravene the General Principles. Substantial offers or offers of travel or accommodation, unless part of an official engagement, should be declined. Regular invitations from the same source which might create obligations or suspicions should be refused.

Gifts

Gifts with an assessed value of more than £50 should not normally be accepted. Where such gifts cannot be refused without causing embarrassment, then they may possibly, exceptionally and subject to the approval of the Chief Executive be kept.

Gifts with a value of less than £50 should only be accepted where they are occasional and where acceptance would not give rise to public concern. Gifts of money should always be refused.

Gifts and benefits of a trivial or inexpensive seasonal nature – for example, diaries and calendars – may be accepted.

Register of Gifts & Hospitality

A register of all gifts and hospitality valued at more than £50 received by Directors and employees should be kept and open to inspection on request.

To ensure a complete record is maintained an annual circulation of the declaration will be made to ensure that all gifts are recorded. Where no gifts/hospitality have been received during the relevant year a declaration to this effect should be made.

This should be submitted to the Chief Executive for countersignature and maintained by the Finance Director (Company Secretary).

Register of Gifts and Hospitality Received by Employees and Board Members – Declaration Form

All Employees and Board Members are asked to declare the receipt of any gifts, hospitality or other material benefits valued at more than £50, which in any way relate to their role, by completing this form and returning it to the General Manager at the earliest opportunity.

Date Received	Name of person who received gift/hospitality	Person/Organisation providing gift/hospitality	Nature of gift/hospitality	Estimated or Actual Value (Over £50)	Additional comments

Name of Employee/Board Member:		Position:	
Employee/Board Member Signature:		Date:	
Chief Executive/Chair Signature:		Date Registered:	