

## **GIFTS & HOSPITALITY POLICY FOR STAFF & BOARD MEMBERS OF THE WATLING GARDENS TMO**

### **1. Purpose**

This policy sets out the procedures Staff and Board Members must follow when giving or receiving gifts and hospitality.

### **2. Policy Statement**

You must declare all offers of gifts and hospitality made to or by you, regardless of value. Offers of gifts and hospitality may include items ranging from diaries, wall charts, and boxes of chocolates, to free international travel and accommodation.

Declarations must be recorded on TMO's Gifts and Hospitality Register. The register is kept in the TMO office.

It is your responsibility to ensure that you are not placed in a position that risks, or appears to risk, compromising your role and the TMO's public and statutory duties. You should not be seen to be securing valuable gifts and hospitality by virtue of your role. You should not accept or provide any gift or hospitality if acceptance/provision will give the impression that you have been influenced/ are deemed to be influencing whilst acting in an 'official capacity'.

This policy also applies to spouses, partners or other associates if it can be argued or perceived that the gift or hospitality is in fact for the benefit of the official.

In exercising judgement as to whether to accept a gift or hospitality the question should be asked what public perception would be if the information was published given your role and circumstances.

### **3. Receiving gifts**

You may retain gifts valued at £40.00 or under.

For gifts exceeding a value of £40.00 the following options are suggested

- Share the gift with all staff
- Raffle the gift for charity
- Donate the gifts to charity or
- Make a donation to charity and keep the gift.

#### **4. Accepting offers of hospitality – genuine business reasons**

Hospitality offered should only be accepted where there is a direct link to working arrangements and a genuine business reason can be demonstrated, for example

- Attendance at a conference, which provides complimentary subsistence, travel and accommodation ( this does not need to be declared on the register except where gift was received, see paragraph 3)
- Attending at a free training course.

It is recognised that, in the course of carrying out your duties, you will need on occasion to ensure good relationships with existing and future contractors and stakeholders and that this may involve for example, the receipt of modest working lunches and dinners. These are acceptable where there is a genuine business reason.

Hospitality invitations to events which are purely social events should be considered very carefully before accepting: in such circumstances it may be much more difficult to substantiate a genuine business reason. Staff are expected to use annual leave for such events. You may not accept free holidays from a current or potential contractor. These invitations should be recorded in the register whether received or declined.

#### **5. Gifts and hospitality**

The TMO must be mindful that the value of all gifts and hospitality offered by the TMO are sourced from public funding, and the expectation is that such funding will be used for legitimate purposes and demonstrate value for money.

In exceptional circumstances it may be appropriate for TMO to provide a gift of up to £40.00 in value, for example:

- Providing a bouquet of flowers to a seriously ill employee, or to longstanding employee who is retiring
- Making a contribution towards staff Christmas festivities.

#### **6. Declaration**

You should make your declaration as soon as possible after the offer or receipt of gifts or hospitality. All declarations are to go to TMO in the required format as show below. TMO will record the declarations in the register. The register is an annual document and will be maintained on a calendar year basis and reported quarterly under the publication scheme. It is recommended that you make your declaration by email, and retain a copy for your personal records.

Your declaration will need to include the following information:

- Date of offer of gift or hospitality, and date of event where relevant.
- Name, job title and organisation of recipient/ provider.

- Nature and purpose of gift or hospitality received or declined
- The name of any other organisation involved
- Estimated value

For example

<b>Date received</b>	<b>Recipient</b>	<b>Received from ( name, position, organisation)</b>	<b>Description of gift/hospitality received</b>	<b>Value £ ( estimate if unknown)</b>	<b>Reason given for providing gift/hospitality</b>
12 December 2018	Jane Brown Corporate services	Josh Sargent ( AAA consultancy)	Lunch at BB Restaurant	Approx. £40.00	Discussion for plans for forthcoming conference

You should consult the Board Secretary for any guidance required on this Policy. In general terms, if you have any doubt about whether an item should or should not be declared, you are advised to declare it.

## **7. Monitoring**

The Register will be reviewed quarterly by The Board.

Staff and the Board will be reminded periodically of their requirement to declare gifts and hospitality provided/accepted/declined in accordance with this Policy.

## **8. Policy Breach**

Staff and the Board who fail to declare the acceptance/provision/decline of hospitality and gifts in accordance with this Policy may be subject to disciplinary action under TMO's Discipline Policy.