



Gifts & Hospitality Policy

Revision	Author	Reviewed by	Date	Approved by	Date
v1	HR Department	Steve Sherry Chief Executive	2019	Steve Sherry Chief Executive	2019
v2	Susan Stoker Head of Corporate Governance	Steve Sherry Chief Executive	July 2021	Steve Sherry Chief Executive	July 2021



Gifts & Hospitality Policy

1. Introduction

RBLI is committed to carrying out its business fairly, honestly, and openly. We believe we should not receive benefits of any kind from third parties which might reasonably be seen to compromise our personal judgement and integrity.

2. Context

Accepting gifts and hospitality, even though it can cost RBLI nothing, can give an impression of inappropriate influence. The Bribery Act 2010, whilst taking a tough stance on corruption, does not aim to stop all forms of corporate hospitality. The important aspect is whether the gifts or hospitality are reasonable and proportionate.

3. Purpose

The purpose of this policy is to provide a clear framework and to help employees understand what to do if they are offered gifts and hospitality. This policy clarifies when gifts and hospitality may be accepted and the record keeping requirements.

This policy does not apply to private gifts between RBLI employees e.g. at Christmas or birthdays, that is at the discretion of the employees concerned.

4. Scope

This policy applies to all persons working for us or on our behalf, including trustees, employees at all levels whether permanent or temporary, contractors, external consultants, and volunteers of RBLI.

5. Related Documents

This policy should be read in conjunction with the following documents:

- Anti-bribery Policy
- Anti-fraud & Corruption Policy
- Code of Ethics & Professional Conduct Policy
- Conflicts of Interest Policy
- Whistleblowing Policy

6. Gifts or Donations Received

You should never use your official position to receive, agree to accept or attempt to obtain any payment or other consideration for doing, or not doing, anything or showing favour, or disfavour, to any person.

You should not receive benefits of any kind from a third party which might compromise or be seen to compromise your personal judgement and integrity.

RBLI in deciding whether to accept or decline a donation or gift will consider the Charity's best overall interest and will not accept either from donors whose activities appear to be in direct conflict with our charitable aims and objectives

An employee or any member of their family / friends should not, directly or through others, solicit or accept money, gifts, hospitality or anything else that could influence or reasonably give the appearance of influencing the relationship with that organisation or individual.

RBLI will not take gifts and/or hospitality from organisations or individuals who participate in activities which:

- Could cause detriment to our reputation
- Undermine our vision and values
- Are associated with unsuitable products, corporates, and individuals
- Anything that is illegal, unsavoury and/or of a sexual nature

7. What types of gift / hospitality are not acceptable?

Certain gifts and/or hospitality should never be given or accepted. These include:

- Cash or cash equivalents (such as gift cards or vouchers)
- Anything that might give rise to a perception or suspicion that the recipient has been unduly influenced
- Gifts or hospitality which are lavish and extravagant
- Gifts or hospitality offered during a tender or bid process, to or from any party involved
- Gifts or hospitality which is recurring, regular and/or could be part of a reciprocal arrangement.

8. What do we mean by gifts and hospitality?

8.1 Gifts

A 'gift' is any item of value provided or offered for the personal benefit of the recipient or close contact (family, friend, or colleague) at no cost, or a cost that is less than its commercial value. Gifts can be categorised into three broad groups:

- **Do not accept:** Gifts which might look to people outside the organisation as if they have been offered to compromise personal judgement and integrity. These will generally be high value items.
- **Can be accepted but will normally be donated as a raffle prize:** Some gifts and hospitality can be accepted. These will generally be lower value items. It should be made clear to the person or organisation that is giving the gift how it is intended to be used. They must be recorded on the gifts and hospitality register.
- **Can be accepted and kept by the individual:** There are also smaller gifts, for example those often handed out at conferences, such as pens, diaries etc., which usually cost less than £20 and are essentially marketing tools. These can be kept by the individual and do not need to be recorded in the register.

8.2 Hospitality

'Hospitality' is any offer of travel, accommodation, food, drink or an invitation to any event (e.g. concert, sporting event, either as a spectator or participant) in the company of a third party (including a client) which the recipient has received:

- Hospitality in the form of reasonable refreshments, working lunches etc. can be accepted and do not need to be recorded in the register.
- Hospitality which goes further, for example formal dinners, or drink receptions organised by a stakeholder, can be accepted but need to **be included** in the register.

9. Authorisation and Reporting

Decisions on which category an offer of a gift or hospitality falls under will depend on the value of the gift or hospitality, the provider, and the circumstances around the offer. If offered a gift or hospitality, in the first instance refer to the table in **Appendix 1**. If you are in any doubt you should discuss with your line manager or the Head of Corporate Governance.

The same will apply as to whether the gift or hospitality must be declared and recorded on the Gifts and Hospitality register held within your department.

All items will be recorded centrally on the local Gifts and Hospitality registers. It is the person receiving the gift or hospitality who is responsible for recording the item in the register. Local registers must be submitted quarterly to the Head of Corporate Governance, who will report on compliance with the policy to the board of trustees. If in doubt do not accept the gift or hospitality.

10. Refusal of Gifts and / or Hospitality

If a gift or hospitality cannot be accepted, it must be declined with courtesy with an explanation that it falls outside of RBLI Policy.

Where a gift or hospitality is received which may not be acceptable under the terms of this policy, you should report this to your line manager, the relevant divisional director and the Head of Corporate Governance in order that the appropriate action can be determined.

11. Gifts and Hospitality Register

A nominated individual in each department holds a local Gifts and Hospitality register. This register is submitted on a quarterly basis to the Head of Corporate Governance. Please seek advice from your line manager on who the nominated individual is for your department.

The central RBLI Gifts and Hospitality Register is maintained by the Head of Corporate Governance. A report on compliance with the policy is made to the board of trustees on a quarterly basis.

12. How to raise a concern

If you have a concern or suspect violation of this policy, we want you to speak up immediately. Speaking up can be a difficult thing to do, so be reassured that information received will be treated seriously and investigated appropriately. If you act in good faith, believing your information is accurate, we will treat this in accordance with the organisation's Whistleblowing policy.

Some concerns may be addressed informally and through speaking to the person whose conduct is cause for concern or through raising your concern with your Line Manager or a member of the HR department.

13. Breach

Non-compliance with this policy by employees may result in disciplinary action up to and including summary dismissal, and for contractors may result in termination of contract.

14. Further Information

This policy will be reviewed regularly to ensure compliance with statutory requirements.

Any queries regarding this policy, or comments, should be addressed to your line manager or the Head of Corporate Governance.

Appendix 1 – Categories of Gifts & Hospitality

CATEGORY	EXAMPLES	WHAT YOU SHOULD DO
<p>Do not accept</p> <p>Generally high value gifts (£50 or more) and hospitality which might look as if it has been offered to compromise personal judgement and integrity</p>	<ul style="list-style-type: none"> • Financial gifts • Expensive food hamper • Membership of or subscription to clubs • Tickets to sporting or social events • Expensive items of clothing 	<p>These CANNOT be accepted, or, if difficult to refuse at the time, should be returned as soon as possible. These do need to be noted in the gifts and hospitality register along with a record of their refusal.</p>
<p>Can be accepted but needs to be authorised</p>	<ul style="list-style-type: none"> • Tickets to sporting or social events if they are organised as networking events 	<p>These need to be authorised by the Director of Corporate Services and their receipt does need to be noted in the gifts and hospitality register</p>
<p>Can be accepted but may be raffled or shared</p> <p>Generally lower value under items (£20 - £50 or less).</p>	<ul style="list-style-type: none"> • Bottle of Champagne • Flower arrangement • Small food gifts 	<p>These CAN be accepted Their receipt does need to be noted in the gifts and hospitality register and if appropriate they should go to fundraising as a raffle prize</p> <p>If the gift has a finite life (i.e. flowers or food etc.) it can be retained by the individual or shared amongst colleagues depending on what is given</p>
<p>Can be accepted and kept by the individual</p> <p>Very low value items (£20 or less) such as marketing gifts given out at conferences etc.</p>	<ul style="list-style-type: none"> • Working lunches and other low value refreshments • Bottle of wine • Chocolates • Pens • Key rings • Mugs • Note pads 	<p>These can be accepted and their receipt does not need to be included in the gifts and hospitality register</p>

Gifts & Hospitality Register – Template

Department: _____

Completed by: _____

Approved by: _____

Date: _____

Date	Details of Gifts / Hospitality	Donated by	To whom	Accepted / Declined	Outcome
	Note 1				Note 2

Note 1: include in here estimated value of gift / hospitality if known

Note 2: Outcome should include if the item was shared by a team, given as a raffle prize, kept by the individual, donated to a beneficiary, used for a fundraising event etc.