



## **Gifts & Hospitality Policy**

### **Purpose**

This policy sets out the procedure staff must follow when giving or receiving gifts and hospitality.

### **Scope**

This policy applies to full time and part time employees on a substantive or fixed-term contract, and to associated persons such as secondees, agency staff contractors and others employed under a contract of service.

### **Policy Statement**

You must declare all offers of gifts and hospitality, made to or by you, regardless of value, in your role as a member of Employ My Ability staff. All such offers must be declared *whether accepted or declined*. 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 made to the Operational Lead, who will add it to the internal register. The register is maintained by the Senior Management Team and is publicly available.

It is your responsibility to ensure that you are not placed in a position that risks, or appears to risk, compromising your role or Employ My Ability's public and statutory duties. You should not be seen to be securing valuable gifts and hospitality by virtue of your job. 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 while acting in an "official capacity".

### **Receiving gifts**

You may retain all gifts valued at £5.00 or under, whether given in recognition of presentations or otherwise.

For gifts exceeding a value of £5.00 the following options are suggested:

- share the gift with all staff;
- raffle the gift for charity;
- donate the gift to charity; or
- make a donation to charity and keep the gift.

### 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 or speaking at a conference, which provides complimentary subsistence, travel and accommodation (this does not need to be declared on the register except where a gift was received, see paragraph 4);
- attending at a free training course; or
- attending a drinks reception to network.

It is recognised that, in the course of carrying out your duties, you may 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. You 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.

### Gifts and hospitality offered by Employ My Ability

Employ My Ability staff must be mindful that the value of all gifts and hospitality offered by Employ My Ability 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 Employ My Ability to provide a gift for example:

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

It is acceptable for Employ My Ability to provide modest hospitality in the way of working lunches and/or dinners to existing and potential contractors and stakeholders subject to a genuine business reason.

### Monitoring

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

### Policy breach

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