

HOSPITALITY AND GIFTS POLICY

Version 1.0: Aug 2015

The logo for Thames Valley Partnership is enclosed in a red speech bubble shape. The text "Thames Valley" is in a grey, sans-serif font, and "Partnership" is in a bold, red, serif font.

**Thames Valley
Partnership**

DOCUMENT CONTROL

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THAMES VALLEY PARTNERSHIP Hospitality and Gifts Policy

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Thames Valley Partnership

1. Overview

Thames Valley Partnership Charity aims to provide support, advice and advocacy to vulnerable people within the community. Occasionally recipients or those that care about the support provided will seek to provide hospitality or gifts to thank our staff or to raise money for the charity.

There is no desire to stop these gifts being received under a safe and fair procedure and to ensure that hospitality is for the benefit of the charity and not individuals.

In addition, certain suppliers or contractors may offer “reward schemes” which allow for free gifts or discount vouchers in return for ordering services or products on behalf of the Charity. Procedures need to be in place to ensure all suppliers and contractors are competitive and that we are all acting in the best interests of the Charity when using a particular supplier or contractor.

For clarity in this procedure a “gift” is any payment or item given in connection with an individual of the charity.

The key element is transparency and a process to review and approve all offerings.

2. Disclosure requirements

2.1 Gifts received

The charity promotes a culture of honesty and transparency in the practice of receiving gifts. If you receive a gift, you must report this to your line manager as soon as it is given to you. You must also provide details of the nature of the gift and the identity of the sender.

In cases where your line manager determines that the gift constitutes a small token of appreciation for you as a personal reward, you may, at your line manager’s discretion, be permitted to retain the gift for it to be shared amongst your colleagues.

If the gift is not a small token of appreciation but has a substantial financial value (as determined by the Charity), you will be required to thank the sender but advise that whilst you are unable to accept the gift personally it can be donated to the Charity should they be happy to do so.

Promotional gifts i.e. small items of food, calendars or stationery that have little financial value do not need to be reported under this procedure.

2.2 Hospitality received

If you are invited to an event in connection with your role or link to the Charity this will be considered as hospitality being offered. You should make your line manager aware of any invitation.

If the event is considered to be inappropriate for you to attend you will be asked to politely decline the invitation or to liaise with the sender as to if the invitation could be offered to benefit the charity as opposed to an individual.

For events which are determined to be genuine, proportionate and reasonable, you may, at your line manager's discretion, be permitted to attend (subject to any agreement relating to time off work where the event is taking place during your normal working hours).

3. Anti-Bribery

The charity is committed to complying with the Bribery Act 2010.

Under the Bribery Act 2010, a bribe is a financial or other type of advantage that is offered or requested with the:

- intention of inducing or rewarding improper performance of a function or activity; or
- knowledge or belief that accepting such a reward would constitute the improper performance of such a function or activity.

We depend on our employees and volunteers to ensure that the highest standards of ethical conduct are maintained in all our business dealings. Employees and volunteers are requested to assist us and to remain vigilant in preventing, detecting and reporting bribery.

Employees and volunteers are encouraged to report any concerns that they may have to their line manager as soon as possible. Issues that should be reported include:

- any suspected or actual attempts at bribery;
- concerns that other employees or associated persons may be being bribed; or
- concerns that other employees or associated persons may be bribing third parties, such as clients or government officials.

4. Incentives

If it is discovered that a supplier has been used wholly or mainly because of the incentive of a free gift (and, as such, the employee has not acted in the best interests of the Charity), this may constitute a disciplinary offence and will be dealt with under the **Disciplinary Policy and Procedure**. Depending on the seriousness of the offence, it may be treated as gross misconduct.

5. Further Information

If you have any questions in relation to the **Hospitality and Gifts Procedure**, please speak to a member of the management team.

All offers of gifts or hospitality should be recorded on a document, shared with your line manager and once completed stored centrally to be available to auditors. The form will include the offer, the recipient, the purpose of the offer (if known), the value and the final decision including all negative responses.

Review of Policy

This policy will be reviewed on an annual basis by the Human Resources Manager to ensure it remains up-to-date and reflects the needs and practices of the organisation.

Gifts and Hospitality Declaration Form

Your name and role in the organisation?

What were you offered / provided?

If known what is the approximate value of the offer?

Who has offered this and what is the purpose?

Line Manager views and signature

Final decision

Date forwarded for filing with HR Department.