



# IPSA Implementation Programme Hospitality and Gift Guide – IPSA Staff

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## 1. INTRODUCTION

This guidance sets out the policy on regularity and propriety in general terms. It provides a framework for staff to follow, and encompasses Hospitality (including working lunches and refreshments), Entertainment, Gifts, Donations, Sponsorship and Prizes.

These arrangements apply to all staff who are employed by IPSA, including all administrative staff, consultants, contract and agency staff, and the Interim Chief Executive and the Chief Executive. Expense claims will be regularly published for all staff above director level. Until IPSA is formally constituted, the Chair will also operate under the rules of this policy.

This guide has been developed in line with IPSA's core values of openness, transparency and value for money which is at the heart of what it has set out to do. Due to the nature of IPSA's work it is unlikely that hospitality will be granted unless in exceptional circumstances. Employees must not put themselves in a position where they may be accused of acting improperly.

Some general principals of propriety are:

- Keeping proper accounts and records to provide transparency and clear audit trails;
- Prudent and economical administration, avoiding waste or extravagance;
- Efficient and effective use of resources to achieve value for money;
- Avoiding conflicts of interest and never using public money for private benefit;
- Never misusing an official position or information acquired in the course of official duties to further private interests or those of others and
- Not receiving benefits of any kind from a third party that might reasonably be seen to compromise personal judgement or integrity.

When considering using public money, you should consider these points:

- Could my actions be perceived as gaining an improper advantage?
- Could I satisfactorily defend my decision before the IPSA Chief Executive?
- Could I satisfactorily defend the decision in public?

## 2. MONETARY LIMITS

In respect of all areas covered in this guidance the decision to offer/accept is to be made bearing in mind all relevant circumstances. Value will inevitably be an important factor and the sum of £30 per person/per instance is to be used as a guide when deciding if cost is acceptable. In principal nothing over £30 should be offered or accepted. Where the cost exceeds £30, the matter must be referred to the Chief Executive in their capacity as Budget Holder.

## 3. RECORDING AND REPORTING

Individual members of staff who receive/give gifts/hospitality are responsible for keeping any relevant documents or correspondence and completing a **Gifts and Hospitality Form**. Details in the form will be collated and added to the **Gifts and Hospitality Register**.

The maintenance of a **Gifts and Hospitality Register** is mandatory and details all gifts/hospitality given/received. The Register will be published through the IPSA Website.

## 4. HOSPITALITY

Hospitality includes the provision of lunches, dinners, and tickets to sporting/social or leisure events. These examples are not exhaustive.

Staff should never ask or encourage individual business contacts, representative bodies, companies or other organisations, to provide hospitality to them or indirectly to other colleagues, friends or relatives.

### 4.1 Accepting offers of hospitality

When deciding upon the acceptance of hospitality, each offer must be considered on its own merits within the principles set out in this policy. The approval of your Line Manager should be sought (they will decide if a referral to the Budget Holder is necessary), except where the hospitality is clearly of a notional value (e.g. refreshments (coffee and biscuits)).

It may be considered appropriate to accept an offer of hospitality (e.g. a working lunch) if it is:

- not lavish in nature,
- offered in the course of an official visit,
- not a regular occurrence,
- there is no suspicion of a conflict of interest,

If staff are at all unsure about whether accepting hospitality does raise a conflict of interest, they should refuse the hospitality.

Due to the nature of IPSA's work, any offers of hospitality from any parties giving or receiving services directly from IPSA should be **refused**.

Staff may accept hospitality in good faith, and subsequently discover it may not have been. In this case the member of staff should inform the Budget Holder in order that an appropriate entry can be made in the "Gifts and Hospitality Register" (see point 3)

Where the offered hospitality is to be declined, you should write to the donor citing the reason.

Anyone accepting hospitality other than of a notional value whether accepted or not, must:

- Confirm it in writing to their line manager
- Complete a gift and hospitality form along with any supporting documentation so that an entry can be made in the "Gifts and Hospitality Register"

This will ensure that IPSA can demonstrate transparency in its dealings with others.

## 4.2 Providing hospitality – Working Lunches and Refreshments

It is permissible to provide hospitality in the form of refreshments (non-alcoholic beverages) or working lunches for internal and external stakeholders and business partners.

Provision of refreshments or working lunches for internal meetings is permissible (where value for money in the pursuance of departmental objectives can be demonstrated). You must consider the following factors in making your decision in each case:

- the scheduled length and formality of the meeting (e.g. it might be considered disruptive for large meetings scheduled to run for 2 or more hours, where no working lunch was provided, to be interrupted for attendees to make their own refreshments);
- the number of attendees (e.g. where this is such that the salary cost of asking a member of staff to make tea and coffee would exceed the cost of ordering from catering providers); and
- the scheduled time to and from a meeting by attendees.

It is not necessary to record the provision of routine hospitality in the “Gifts and Hospitality Register”. However, if the hospitality could be seen as exceptional for example large numbers catered for, total cost is significant, or the cost per head is higher than appropriate given the business context, then it should be recorded.

Team Managers must obtain prior approval to incur expenditure from the Budget Holder, providing him with the following information in writing:

- the circumstances giving rise to the proposed entertainment (include any project ref.);
- justification for the expenditure;
- type and cost of entertainment;
- details of guests and number of hosts.

If the Budget Holder agrees that it is reasonable and appropriate for the hospitality to be provided he will give his approval in writing.

## 5. ENTERTAINMENT

Generally, the conduct of our business should not require the offering or receiving of entertainment. It is advised always to err on the side of caution in this area. A fundamental test is whether the entertainment provided or received could be defended and whether it is in line with IPSA’s core value of Value for Money.

Senior members of staff with the appropriate financial authority may on occasions be expected to entertain official visitors, such as senior officials from foreign countries. In these circumstances it might be appropriate to provide modest entertainment such as a restaurant dinner. At such an occasion, it would be improper to invite other staff at public expense (unless they were fulfilling an essential support function).

Staff should ensure that proper written authorisation from the Chief Executive is obtained before the entertainment is incurred and that the costs of such functions are kept to a reasonable level, commensurate with demonstrating probity in the use of public funds.

It is not appropriate for entertainment to be provided at public expenses for other members of the IPSA. This includes members of staff hosting for example a leaving party for employees at public expense.

## 5.1 Recording Entertainment Given or Received

The details of any entertainment offered or received should be recorded in the “Gifts and Hospitality Register” (see point 3).

## 6. GIFTS

### 6.1 Definition

A gift is defined as “something which is voluntarily given or donated without the expectation or receiving anything in return”. Gifts can include gift vouchers and similar items such as air miles.

This section sets out ISPA policy towards the giving and receiving of gifts in an official capacity. The aim of these rules is to guard against risk of an allegation of staff impropriety by providing advice on a matter of key issues relating to the rules of regularity and propriety.

### 6.2 Receiving gifts

Control over the acceptance of gifts is stringent for obvious reasons. All staff must be seen to act with complete honesty and integrity, and must not put themselves in a position where they could be accused of acting improperly. The acceptance of gifts from interested business parties could be presented as promoting a conflict of interest that might arguably have compromised the impartiality of officials in the decisions that they were required to make.

Due to the nature of IPSA’s work, any offers of hospitality from any parties giving or receiving services directly from IPSA should be **refused**.

Retention of accepted gifts by the recipient is at the discretion of the Chief Executive.

Anyone offered a gift whether accepted or not, must:

- Get it authorised in writing by the budget holder
- Complete a gift and hospitality form, together with any supporting documents, and ensure that an entry is made in the “Gifts and Hospitality Register” (see point 3).

This will ensure that the department can demonstrate transparency in its dealings with others.

If staff suspect that a gift is offered with the intention to bribe or otherwise influence, they must report the matter to their line manager as soon as possible. It is a criminal offence under section 1 of the Prevention of Corruption Act 1906 for an employee to accept any gift or consideration as an inducement or reward by:

- doing, or not doing, anything in your official capacity; and/or
- showing favour or disfavour to any person in your official capacity.

Acceptance of a gift or consideration in these circumstances is considered as gross misconduct and could result in dismissal.

The general principles for the acceptance of gifts are set out below:

- The gift must be of a nominal or notional value and not in excess of any previously advised value (see point 2)
- The gift must be given for an appropriate reason (i.e. for diplomatic reasons such as visiting foreign officials),
- The gift must be given at an appropriate time (i.e. not in advance of an award or contract),
- The gift must be of a one-off or irregular nature (i.e. that could not be viewed as a regular source of income by HM Revenue & Customs).

If in doubt, the question whether to accept a gift should be referred to the Chief Executive. The Chief Executive may in exceptional circumstances, override the above principles where we are able to demonstrate that the business needs of IPSA, along with the related risks to its reputation, justify it. An example of this might be where a visiting foreign dignitary offers a gift, and to refuse it would cause offence. Approval for the acceptance of a gift should be sought as soon as the gift is offered.

In reaching a decision you must consider whether the gift should be put to another use (e.g. donated to charity or a library or displayed in public) and the possible risks to the reputation of the department associated with keeping the gift. If donated, adopting the giver's preferred charity where appropriate would avoid any question of conflict of interest in the choice. It would be wrong to solicit a gift on the basis it will go to charity. In no circumstances may an individual sell or exchange an accepted gift for monetary or personal gain.

### **6.3 Providing gifts**

It would not normally be appropriate for staff to give official gifts, but when this arises authorisation must be obtained from the budget holder after the following points have been considered:

- Circumstances giving rise to the need for the gift and the details of the recipient;
- Justification for the gift in terms of IPSA's objectives;
- Description of the gift, which should not be of an uncontentious nature;
- Cost of the gift (which should be modest, and not exceed the value of the gift received where it is reciprocal).

Where a dignitary provides a service at an official event it may be appropriate to provide a small gift or memento (e.g. a bouquet of flowers or small commemorative gift).

### **6.4 Recording Gifts given or received**

Anyone giving a gift must get authorisation from the Chief Executive and ensure that any entertainment offered or received should be recorded in the "Gifts and Hospitality Register" (see point 3).

### **6.5 Reciprocal gifts**

These are not encouraged. However, there may be circumstances where the failure to give a gift could cause offence. An example would be an official visit by a foreign

official whose custom would be to give/or receive a token of friendship or respect. In these circumstances approval by the Chief Executive should be sought first and a gift and hospitality form completed as above.

## **7. AWAY DAYS AND TEAM BUILDING EVENTS**

These occasional events are organised to develop working relationships and achieve departmental objectives. They are acceptable as long as the event can be justified as good value for money and can demonstrate development achievements. Costs should be reasonable and comparable to the status of the event.

## **8. DONATIONS**

Monetary donations are not generally considered appropriate and should never be made without reference to the Chief Executive.

Donations to IPSA for example, a fee for a speech or a presentation should not be accepted nor a request made to donate to a charity or other cause instead. It would be a conflict of interest to accept a donation when performing a duty or role on behalf of IPSA.