

Gifts and Hospitality Policy

Document information

Approved by: Audit & Risk Committee	Date: 4 March 2021
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ELT Owner: General Counsel	Policy lead & contact: Company Secretary, governance@parkinsons.org.uk

Gifts and Hospitality Policy

1. Purpose

- 1.1 At Parkinson's UK our vision - and our motivation - is to find a cure and improve life for everyone with Parkinson's. We all have a duty to make sure that charity resources and funds are used for the purpose for which they were intended. While gifts and hospitality can be accepted in certain limited circumstances, you should not receive benefits of any kind from third parties which could call into question your motivation, integrity or judgement - this could be considered bribery.
- 1.2 Principle 3 (integrity) of The Charity Governance Code for larger charities recommends that "registers of interests, hospitality and gifts are kept and made available to stakeholders in line with the charity's agreed policy on disclosure". Parkinson's UK's Gifts and Hospitality Register is reported to the Audit & Risk Committee and is available on request to trustees, the chief executive and members of the executive leadership team.
- 1.3 Parkinson's UK is committed to combating bribery and corruption in all its dealings and activities as set out in the Anti-Fraud, Bribery and Corruption Policy which should be read alongside this policy.

2. Scope

- 2.1 This policy applies to all volunteers, employees, other staff members and agents of Parkinson's UK and its subsidiaries. **For the purposes of brevity in the policy all references to 'staff' should be taken to mean 'employees, other staff members and agents of Parkinson's UK'.**
- 2.2 This policy applies to gifts or hospitality either offered from or offered to third parties (e.g. individuals, organisations or companies outside the charity). The policy does not apply to the following:
 - Hospitality at events / conferences / training etc that (a) you have paid a standard fee to attend where hospitality costs are included or (b) are free to attend and open to all.
 - Hospitality you may receive from the charity in the course of your work, e.g. working lunches.
 - Internal gifts or hospitality, e.g. a one-off thank you gift for a volunteer or a staff lunch (unless they are for trustees). Purchase of such gifts must: be approved by your manager or staff contact or lead volunteers (if you are a member of a local group); and be a reasonable and proportionate use of charity money given the circumstances (no more than £30). These do not need to be reported and recorded on the Gifts and Hospitality Register.

The exception to the above is gifts purchased for trustees and independent committee members. Trustees must not receive benefits or payment in relation to their role, therefore all gifts to trustees must be reported and recorded on the Gifts and Hospitality Register. The charity extends this requirement to its committee members, who are subject to the same standards as trustees via the charity's Code of Conduct.

- 2.3 This policy does not cover 'Gifts in Kind'. Gifts in Kind are where the charity might be offered goods or services as donations, rather than cash, for example use of a meeting room. Gifts in Kind are managed by the Commercial Partnerships Team and you should contact Ghalib Ullah, Head of Commercial Partnerships on gullah@parkinsons.org.uk.
- 2.4 This policy does not cover receipt of cash donations to the charity. Receipt of cash donations is governed by the charities fundraising policies and procedures. Please refer to the Acceptance and Refusal of Donations Policy and/or contact the fundraising team for information.

3. Definitions

- 3.1 Gifts are physical objects (including cash) offered by a person or organisation outside the charity to a person or team within the charity. Gifts are categorised as follows:
- **Category A: little or no intrinsic value** - these items are under £10 in value, for example, pens or notebooks given out at conferences.
 - **Category B: estimated intrinsic value £10-£50** - for example, flowers, a bottle of wine, etc.
 - **Category C: gifts valued over £50** - for example, a case of wine or expensive hamper.
 - **Category D: gifts from a person or organisation with which you know we are considering entering a contract; any gift of cash which is not a donation to the charity.**
- 3.2 Hospitality could be travel, accommodation, food, drink, entertainment, or a cultural or sporting event. In the context of virtual events, hospitality could be food or drink sent to be consumed during the virtual event (e.g. a hamper).
- 3.3 References in this policy to the charity or Parkinson's UK includes its subsidiaries.

4. Key policy principles

- 4.1 All offers of gifts and hospitality (except category A gifts) must be declared to your manager or staff contact, regardless of whether they are being accepted or declined.
- 4.2 Managers and staff contacts must inform the Company Secretary at governance@parkinsons.org.uk of any gifts or hospitality received. They will be asked to complete a form in order to log the gift or hospitality on the Gifts and Hospitality Register.
- 4.3 The Company Secretary will maintain the Gifts and Hospitality Register.
- 4.4 Before accepting or offering any gifts or hospitality, you must consider whether doing so is in the direct interest of the charity and proportionate to that interest. When considering this, think about whether a fair-minded member of the public, knowing the facts of the matter, would see anything improper or suspicious in the gift or hospitality being offered or received. If you have any doubts, you should speak to your manager or volunteer coordinator for advice or contact the governance team at governance@parkinsons.org.uk or simply refuse.
- 4.5 Likewise, if you are in any doubt of the likely value of any gift or hospitality the details should be shared with governance@parkinsons.org.uk for inclusion in the Gifts and Hospitality Register.

5. Offers of gifts or hospitality made by third parties to staff or volunteers

	Can accept	Report to / approved by	Record on G&H Register	Additional notes
GIFTS OFFERED BY THIRD PARTIES				
<u>Category A</u> (little or no intrinsic value)	Yes	No	No	If you receive repeated category A gifts from the same source in a single year you must report these to your manager or staff contact.
<u>Category B</u> (£10-£50 intrinsic value)	Yes (raffle or share)	Manager / staff contact	Yes	
<u>Category C</u> (over £50 intrinsic value)	No (raffle)	Manager / staff contact (gifts over £100 approved by CEO)	Yes	On occasions it may be difficult to refuse a high value gift (e.g. an international delegation and refusal would cause offence) in these cases the gift should be raffled.
<u>Category D</u> (see 2.1)	No	Manager / staff contact	Yes	Must not be accepted in any circumstances. Gifts of cash which are not donations to the charity must never be accepted.
HOSPITALITY OFFERED BY THIRD PARTIES				
Conventional hospitality (such as a working lunch/dinner or overnight stay).	Yes	Manager / staff contact	Yes	The value of all such hospitality must be reasonable in the circumstances.

Occasional events like annual dinners of an organisation you work with or working lunches during a visit for work purposes	Yes	Manager / staff contact	Yes	<ul style="list-style-type: none"> • The total cost of the hospitality must be reasonable. • The cost should not be more than £100. • You need to be sure that the event could not be seen as an attempt to influence your work for the charity.
Virtual hospitality in circumstances where conventional in-person would have been accepted.	Yes	Manager / staff contact	Yes	Should not include items that cannot reasonably be consumed during the event - such items should be considered gifts and dealt with as such.
Hospitality over £100 or frequent invitations	Within limits	Director / CEO	Yes	<ul style="list-style-type: none"> • Any event or or hospitality over £100 in value must be approved by your director in advance (your staff contact can arrange this if you are a volunteer). • If you are receiving frequent invitations to events you should speak to your director. • CEO approval is required for any hospitality over a value of £500 for a single staff member in a calendar year.

6. Offering gifts or hospitality to third parties

- 6.1 One-off gifts of a trivial nature may be offered to third parties where it is normal and reasonable. For example, a box of chocolates may be given to a speaker at a local event.
- 6.2 Conventional hospitality may also be offered to third parties where again it is normal and reasonable in the circumstances. For example, a director may offer to pay for lunch when meeting with one of the charity's stakeholders to discuss the work of the charity.
- 6.3 **You must get approval from your manager or staff contact or lead volunteers before purchasing a gift or hospitality for others.** Managers, staff contacts and lead volunteers should declare any gifts or hospitality for third parties over a nominal value of £30 to governance@parkinsons.org.uk.
- 6.4 You should not offer gifts or hospitality to others working or seeking to work with the charity.
- 6.5 If you use your own money to pay for a gift or hospitality, you may claim back the money spent through the normal expenses process and subject to the monetary limits stated.

7. Responsibilities

- 7.1 The following responsibilities apply in relation to this policy:
 - The **Audit & Risk Committee** owns this policy on behalf of the board and is responsible for approving changes and updates.
 - The **General Counsel** is the ELT owner of this policy and is responsible for ensuring policy compliance and implementation throughout the organisation.
 - The **Company Secretary** is responsible for ensuring the policy is regularly reviewed and updated; for ensuring declarations are logged appropriately on the registers; and for reporting to the Audit & Risk Committee once a year on the Gifts and Hospitality Register.
 - The **Associate Director of HR and Facilities** is responsible for ensuring this policy is embedded in induction materials for new staff members.
 - The **Head of Volunteering** is responsible for ensuring this policy is embedded in induction materials for new volunteers.
 - **Managers and volunteer staff contacts** are responsible for ensuring that their teams are aware of what to do when offered gifts or hospitality and for ensuring that any offers are reported to governance@parkinsons.org.uk where required by this policy.
 - **All staff and volunteers** are responsible for reporting offers of gifts or hospitality to their managers or staff contacts as required by this policy.

8. Monitoring, compliance and review

- 8.1 The Company Secretary will monitor the Gifts and Hospitality Register and submit this each year to the Audit and Risk Committee.
- 8.2 The policy will be reviewed every three years (or when necessary) and approved by the

Audit and Risk Committee.

8.3 Staff who are found not to have acted in accordance with the above policy may be disciplined and in serious cases may be dismissed on the grounds of gross misconduct.

8.4 Volunteers who have not acted in line with this policy will be investigated under our problem solving policy and may face suspension or dismissal from volunteering.

9. Related documents

- Anti Fraud, Bribery and Corruption Policy
- Conflict of Interests Policy
- Policy on Acceptance and Refusal of Donations

Appendix 1: Record of review

Date of approval	Summary of changes
4 March 2021	<ol style="list-style-type: none">1. Combining the policy into one, so as to not have duplicate separate policies for staff and volunteers.2. Restructuring of the policy to ensure it is easy to follow (the previous policies were effectively a list of instructions in no particular order).3. Clarification of policy scope, including what is excluded in order to avoid confusion and unnecessary declarations.4. Being clear about the standards trustees are held to in relation to receipt of gifts (and holding committee members to those same standards) (paragraph 2.2)5. Addition of clear categories for gifts with associated values. We have not raised the lower or upper value limit associated with gifts however we have provided additional clarification around those gifts which must not be accepted at all (category D) and those gifts that fall in the middle range (category B). The new categories are:<ul style="list-style-type: none">○ Category A: little or no intrinsic value - may be accepted, do not need to be reported.○ Category B: estimated intrinsic value £10-£50 - may be accepted, should be raffled or shared, must be reported.○ Category C: gifts valued over £50 - should not generally be accepted.○ Category D: gifts from a person or organisation with which you know we are considering entering a contract; any gift of cash which is not a donation to the charity.6. Addition of 'virtual hospitality' as a category of hospitality.7. Addition of 'responsibilities' section.8. Reducing the limit of combined total hospitality from £600 per year to £500 per year.