



THE BIRMINGHAM & MIDLAND INSTITUTE

9 Margaret Street
Birmingham
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Charity No. 522852

GIFTS & HOSPITALITY POLICY

1. Purpose

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

2. Scope

This policy applies to all employees and volunteers.

3. 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 staff of The Birmingham & Midland Institute. 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 recorded on the institute's Gifts and Hospitality Register (the register). The register is maintained by the Honorary Secretary 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 that of the institute. 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".

In exercising judgement as to whether to accept a gift or hospitality the question should be asked what public perception would be if the information was published given your role and circumstances.

4. Receiving gifts

You may retain all gifts valued at £40.00 or under, whether given in recognition of presentations or otherwise.

For gifts exceeding a value of £40.00 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.

5. 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 will 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.

6. Gifts and hospitality offered by the institute

Staff must be mindful that the value of all gifts and hospitality offered by the institute are sourced from a charitable organisation, 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 the institute to provide a gift of up to £40.00 in value, for example:

- providing a bouquet of flowers to a seriously ill employee, or to a longstanding employee who is retiring;
- giving book tokens to someone who spoke at an institute event free of charge; and
- making a contribution towards staff Christmas festivities.

It is acceptable for the institute 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.

7. Declaration

You should make your declaration as soon as possible after the offer or receipt of gifts or hospitality. All declarations are to go to the Honorary Secretary in the required format as shown below. The gift will record the declarations in the register. The register is an annual document and will be maintained on a calendar year basis and reported in the Annual Report to Members. It is recommended that you make your declaration by email, and retain a copy for your personal records.

Your declaration will need to include the following information:

- date of offer of gift or hospitality, and date of event where relevant;
- name, job title and organisation of recipient / provider;
- nature and purpose of gift or hospitality received or declined;
- the name of any other organisation involved;
- estimated value.

For example:

Date received	Recipient	Received From	Description of Gift	Value	Reason for Gift

You should consult the Honorary Secretary for any guidance required on this Policy. *In general terms, if you have any doubt about whether an item should or should not be declared, you are advised to declare it.*

8. Monitoring

The register will be reviewed annually. The Honorary Secretary will oversee the register and will ensure that details are published in the Annual Report to Members.

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

9. 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 the institute's Disciplinary Policy.

Approved by the Board of Trustees: 29th June 2020

Next Review Date: June 2021