



Kensington and Chelsea Social Council Handbook

Policy Group	Code of Conduct		
Procedure No.	3.8	Version No.	1
Written by	Sylvia Nissim	Last Updated	Sept 19
Date Ratified	26/11/19	Review Date	Sept 20

3.8 Gifts & Hospitality Policy and Register

1. Purpose

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

2. Scope

This policy applies to all employees and volunteers, and to associated persons such as those on secondment, agency staff contractors and others employed under a contract of service. It also applies to all trustees on the board of KCSC.

3. Policy Statement

- a) You must declare all gifts and hospitality, made to or by you that are valued at over £15.
- b) Offers of gifts and hospitality may include items ranging from money to goods such as flowers, vouchers, and chocolates to travel or event tickets and meals.
- c) Declarations must be recorded on KCSC's Staff and Trustees Gifts and Hospitality Register. The register is maintained by the Board Secretary and Office Manager and is publicly available on KCSC's website.
- d) It is the responsibility all staff and trustees to ensure that they are not placed in a position that risks, or appears to risk, compromising their role. Staff and trustees should not be seen to be securing valuable gifts and hospitality by virtue of their job or role.
- e) Staff and trustees should not accept or provide any gift or hospitality if acceptance/provision will give the impression that they have been influenced/are deemed to be influencing while acting in their professional capacity.
- f) In exercising judgement as to whether to accept a gift or hospitality the question should be asked what public the perception would be if the information was published given your role and circumstances, could acceptance be perceived as an incentive to act in favour of the donor?

4. Receiving gifts

Staff and trustees may retain all gifts valued at £15 or under and need not declare it.

For gifts exceeding a value of £15 the following options are suggested:



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- Declare the gift but return it if it is felt that keeping the gift might be compromising in accordance with the policy statement points d – f), or
- If it is felt appropriate to keep the gift then suggested options are
 - share the gift with all staff;
 - raffle the gift for charity;
 - donate the gift to charity;
 - make a donation to charity and keep the gift.

5. Accepting offers of hospitality

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 on receiving gifts);
- Attending a free training course; or
- Attending a drinks reception to network.

It is recognised that, in the course of carrying out duties, KCSC staff will need on occasion to build and maintain 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 hospitality does not exceed £15. Hospitality over £15 needs to be declared.

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.

6. Offering gifts and hospitality

KCSC may from time to time offer gifts and hospitality and so must be mindful that the cost of these is taken from charitable and public funds, 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 organisation to provide a gift of up to £50 in value or greater, for example:

- Providing a bouquet of flowers to a seriously ill employee, or a leaving gift for a trustee of a longstanding employee;
- Giving book tokens as a 'thank you' to a Volunteer.

Such gifts are not required to be recorded in the Gifts and Hospitality register as they will go through KCSC's financial approval process as laid out in the organisation's financial procedures.



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7. Declaration

For all gifts valued at £15 or over, all staff and trustees should make a declaration prior to or as soon as possible after the receipt of gifts or hospitality. Declarations can be made by email or by completing the Declaration Form below, to be sent to KCSC's Office Manager. All the information will be kept on an electronic register.

The declaration must include the following information:

- Date 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;
- Name of any other organisation involved;
- Estimated or actual value.

Failure to declare in accordance with this policy could lead to an internal investigation and possible disciplinary action or removal of trusteeship.

Policy developed/updated	Approved by	Date	Signed by	Date
September 2019	Board	26/11/19	Chair	26/11/19
September 2021				



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Appendix A: Declaration form

Date:

Date of gift or hospitality	date of event where relevant

Recipient information

Name	job title	organisation of recipient / provider

Nature and purpose of gift or hospitality received or declined

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Name of any other organisation involved

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Estimated or actual value

£



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Appendix B: Gifts and Hospitality Register

Receiving gifts and/or hospitality

Date gift received/hospitality attendance	Name/Organisation of recipient or KCSC staff/trustee recipient	Name and organisation details of party giving gift/hospitality	Details of gift/hospitality	Estimated price (£15 and over) (£)	Intention/context of gift/hospitality (where known)	Approved (Y/N)	Name of approving manager