

## GIFTS AND GRATUITIES POLICY

#### INTRODUCTION

Age UK Buckinghamshire (Age UK Bucks) recognises that from time-to-time clients or their families may wish to express gratitude to the organisation in the form of gifts or donations to staff & volunteers. The aim of this policy is to ensure that staff and volunteers have clear guidelines if they are offered gifts, donations or hospitality.

#### Scope

This policy applies to all gifts and hospitality offered to staff and volunteers. This policy does not apply to the following:

- Hospitality at events/training courses etc that have been paid a standard fee or are free to attend, where hospitality costs are included.
- Hospitality you may receive from Age UK Bucks in the course of your work, e.g. working lunches/dinners
- Internal gifts or hospitality e.g. a one-off thank you, birthday or anniversary gift or lunch.

#### Gifts and Gratuities

Age UK Bucks is aware that it is possible for staff or volunteers to acquire a position of influence over clients. It is also recognised that clients may wish to thank our staff or volunteers with a gift of some description.

In order to protect our staff and volunteers from any accusations of improper conduct, it is important to have a policy to cover this. As a rule, staff and volunteers must never accept cash or any monetary payment as a gift. However, one off small gifts, with a maximum value of £20.00, such as flowers, a bottle of wine, chocolates or a low value Christmas present is acceptable.

If clients do offer a monetary gift, this should be politely refused, and they can be encouraged to make a donation to Age UK Bucks instead.

Gifts should be one off- such as Christmas, or at the end of support / service being provided. Staff and volunteers should refuse regular gifts and raise these cases with their line manager. The line manager should then speak with the client, family or friend.

#### Recording

Staff and volunteers should inform their line manager that a gift has been offered and received. Details of the gift and value should then be provided to the Head of Central Services for inclusion in the Gifts and Hospitality Register.

### Wills and Bequests

If a client seeks advice about making a Will, they should be encouraged to see a solicitor. Under no circumstances may Age UK Bucks staff or volunteers act as Executor to an Estate for a client.

If an Age UK Bucks worker has prior knowledge of the intention of a client to make a personal bequest to them, they should attempt to dissuade the client and suggest that a bequest to Age UK Bucks would be more appropriate and inform their Line Manager.

#### Hospitality

Age UK Bucks may provide hospitality in connection with its business affairs. The hospitality may be provided to:

- Directors / Trustees
- Staff members
- Volunteers
- Representatives from organisations, statutory bodies or companies visiting Age UK Bucks premises on business
- Any other visitors connected with the business of Age UK Bucks

Modest hospitality is an accepted courtesy of a business relationship. The recipient should however be conscious of the need to avoid a position where s/he might be or appear to be influenced in making a decision by such hospitality. The frequency and scale of hospitality should not be significantly greater than Age UK Bucks would be likely to provide in return. The hospitality provided should normally not exceed the provision of tea / coffee / sandwiches or lunch.

Where a situation arises and an employee is uncertain as to whether or not it would be appropriate to accept an offer of a gift or hospitality, the offer should be declined or advice sought from their Line Manager.

## Bribery and Corruption

The Bribery Act 2010 makes it a criminal offence to seek a bribe, offer a bribe, or for Line Management to turn a blind eye to any wrongdoing. Age UK Bucks will never condone any practice of this nature and it will be considered a disciplinary offence regardless of the outcome of any criminal investigation.

Employees must be aware that it is a serious criminal offence for them corruptly to receive or give any gift, loan, fee, reward, or advantage for doing, or not doing anything, or showing favour or disfavour to any person while the employee is acting in his or her official capacity.

Seeking advice and support in any situation which causes concern and following our Gratuities Policy will help an employee demonstrate that any such rewards received have not been corruptly obtained. In the unlikely event that circumstances arise where you are to make a gift on behalf of Age UK Bucks in circumstances that could be interpreted as seeking to influence an individual corruptly then written authority from the Chief Executive must always be obtained. Any gift made on behalf of Age UK Bucks will not be sanctioned where there could be any suspicion of wrongdoing.

The absence of actual corruption is not, in itself, sufficient. Avoidance of any grounds for suspicion of corruption is also important at all times and particularly where contracts are being negotiated. Employees should wherever possible, avoid negotiating with a potential contractor, supplier, or purchaser on a one-to-one basis. Where one-to-one negotiations are involved, including telephone negotiations, the employee must ensure that all steps in the negotiations are recorded in writing and the Chief Executive has been made aware of and approved those steps and the outcome of the negotiations.

# Appendix – Register for gifts

Gift Register	- managed	by H of CS	3			
					Estimate or	
	Offered	Received			actual value of	Action:
Date	to	from	Description	Reason	gift/hospitality	Accepted/Declined
DRAFT EG						
02/05/2023	Atest	Btest	Bottle of wine	Thank-you	£30	Accepted
05/05/0000	<b>.</b>	5	-	D 1	2122	Declined and advised to
05/05/2023	Ctest	Dtest	£100	Birthday gift	£100	donate to AUKB