

Age UK Kensington and Chelsea

Title	Gifts and Hospitality Policy	
Policy author and owner	Finance and Risk Committee	
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Date approved	24th January 2022	
Amended and updated	Summary of change	Date
Amended and updated on		
Amended and updated on		
Amended and updated on		
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Planned review date	January 2025	

Age UK Kensington and Chelsea Policy - Gifts and Hospitality

Overview

Age UK Kensington and Chelsea (AUKC) is committed to carrying out its business fairly, honestly and openly. We believe that we should not receive benefits of any kind from third parties that might reasonably be seen to compromise our judgement and integrity.

The purpose of this policy is to protect the users of the services that we provide, particularly from any financial exploitation from our employees and volunteers. Similarly, the policy is also intended to help protect staff and volunteers from any suggestion of improper behaviour or the exerting of undue influence on their part and by extension, to protect the good name of AUKC.

AUKC values its reputation for ethical behaviour and financial probity and reliability. Accordingly, we recognise that any involvement in bribery is both illegal and will adversely impact our image and reputation.

The aim of this policy is to help employees understand what to do if they are offered gifts and hospitality and to provide a clear framework to ensure all relevant parties understand what constitutes bribery, corruption or exposes the charity to accusations (founded or unfounded) of unethical or unlawful behaviour.

In deciding whether to accept or decline a donation or gift, the recipient should consider the charity's best overall interest and not accept donations from donors whose activities appear to be in direct conflict with our charitable aims and objectives.

Any breach of this policy is likely to constitute a serious disciplinary matter for the individual concerned and may cause serious damage to the reputation and standing of AUKC.

Principles

Our policy is based on the following principles:

1. Integrity - supporting our staff to *do the right thing*; and
2. Compliance - adopting a zero tolerance to bribery, fraud, and wrongdoing; and
3. Transparency - having clear procedures for our staff to follow.

Application

This policy applies to all persons working for us or on our behalf, including trustees, employees at all levels - whether permanent or temporary, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives and business partners.

Standards

We will maintain five key standards in all our applying this policy, as follows:

1. AUKC permits corporate entertainment, gifts, hospitality and promotional expenditure that is undertaken for the purpose of establishing or maintaining good business relationships, to improve the image and reputation of the organisation or to present the organisation's services effectively and if it is arranged in good faith and not offered, promised or accepted to secure an advantage; and
2. Staff and volunteers working for the organisation may not accept any gift of money or in kind, except for a small token present (for example, a box of chocolates or similar) at Christmas or similar festivals at which the giving and receiving of gifts is customary. Those gifts will be shared when appropriate with the rest of the team; and
3. Staff and volunteers cannot accept or ask for any gratuity (tip) from a client, nor offer to buy or sell any items from a client (for example, from a mail order catalogue), nor request or accept any loan of money or goods from a client; and
4. In no circumstances, should staff or volunteers accept any bequest in a client's will or agree to act as a witness or as an executor of a client's will or of any other legal document; and
5. AUKC will fully investigate any instances of alleged or suspected bribery, fraud or corruption, including facilitation.

Responsibilities

The Executive team has overall responsibility for ensuring that the Gifts and Hospitality, Anti-Corruption and Bribery policy is robust and for reviewing it periodically or where legislative changes are made.

Managers, employees and volunteers must ensure that they read, understand and comply with this policy.

The prevention, detection and reporting of bribery and other forms of corruption are the responsibility of all those working for AUKC. All workers are required to avoid any activity that might lead to or suggest a breach of this policy.

Employees must notify your manager as soon as possible if it is believed or suspected that a conflict with this policy has occurred or may occur in the future. For example, if a client or supplier offers something to gain an advantage with us or indicates that a gift or payment is required to secure their business.

Our Whistleblowing policy offers guidance for those who feel concerned about reporting these issues.

Any employee who breaches this policy may face disciplinary action, which could result in dismissal for gross misconduct.

Legislation

This policy is based on UK legislation as follows:

1. Bribery Act 2010; and
2. Data Protection Act 2018.

Definition

Bribery - means a financial or other inducement or reward for action which is illegal, unethical, a breach of trust or improper in any way. Bribes can take the form of money, gifts, loans, fees, hospitality, services, discounts, the award of a contract or any other advantage or benefit. Bribery includes offering, promising, giving, accepting or seeking a bribe.

Procedure

Receipt of gifts - Any employee or volunteer who receives a gift of any kind from an existing or potential business contact or client must disclose the fact of the gift, its nature and identity of the sender to their line manager. If the gift is anything other than a small token of appreciation (for example, flowers, box of chocolates, candle and something having no lasting financial value), the employee will be required to return the gift to the sender with a polite note thanking them and explaining that it is the organisation's policy that employees should not receive gifts. The limit on gift value to be recorded onto a gift register - will be noted in the procedure - and amended from time to time.

Responsibility and review of this policy

Each policy will bear a front sheet summarising the date of approval, date(s) of any amendments and proposed date of review.

Responsibility for this policy rests with the Chief Executive (AUKC) and appointed Executive Lead. The policy was approved in January 2022. It is due for review in January 2025 or sooner if circumstances demand otherwise.