



Gifts & Hospitality Policy



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1.0	1/1/2015	Initial document



BTTAD is committed to the highest possible standards of openness, probity and accountability.

As a recipient of public funds and being accountable to members and the general disabled table tennis playing public it is essential that colleagues and Board members display the highest standards of personal honesty and integrity when dealing with gifts and hospitality and follow the prescribed procedures to ensure transparency and propriety. It is also an offence under the Bribery Act 2010 to:

- Offer or give a person anything of value in order to induce, or reward them for doing something improper or
- Request, agree to receive or accept anything of value for doing something improper.

Someone behaves improperly when they carry out a business related task in a way that breaches an expectation that they will carry it out impartially or in good faith or the person carrying out the task is in a position of trust and breaches that trust.

Penalties for breaches of the Bribery Act 2010 are serious, and include unlimited fines and imprisonment. If staff or Board members suspect any person is giving or receiving bribes inappropriately, they should refer to processes outlined in the whistleblowing policy.

BTTAD does not prohibit the receipt or giving of gifts or hospitality, however when BTTAD colleagues or Board Members receive or give gifts and hospitality, it may create the appearance of impropriety. BTTAD does however recognise that there are a range of circumstances surrounding the receipt and provision of gifts and hospitality and each case has to be judged on its own merits. This policy provides some guidance to inform that judgement, however as a general guide, colleagues should ask themselves: 'would the reputation of BTTAD and my own reputation be damaged if this was reported by a national newspaper?' BTTAD and Board colleagues must use special care to avoid the existence - or even the appearance - of an improper situation.

Scope

This Policy will be applied consistently in relation to all colleagues regardless of gender, gender reassignment, marital or family status, age, disability, ethnic origin, creed, religion/belief, sexual orientation, Trade Union membership or any other condition or requirement which cannot be shown to be justifiable.

It is the responsibility of all colleagues to be familiar with this policy and to be responsible for their own compliance with this policy and the law. The fact that a supervisor instructed you to perform an act that violates this policy, other BTTAD policies, or the law is not an excuse.

Qualification/exemptions

These arrangements apply to:

- All BTTAD employees
- All staff placed through agencies e.g. interns, contractors, temporary staff
- BTTAD Board



- BTTAD Executive Committee

Aims of the Policy

The policy provides guidance for BTTAD on seeking, receiving and providing gifts and hospitality. This policy does not cover every issue that may arise, but it sets out basic principles that must be complied with and provides a guide to be used whilst performing duties or responsibilities on behalf of BTTAD. However, there are no absolute rules on what is acceptable, and you must use judgement and good sense when deciding whether to accept or give gifts and hospitality.

Accepting Gifts and Hospitality

The guiding principles governing the acceptance of gifts and hospitality by colleagues are:

- The conduct of colleagues should not give rise to any suspicion of conflict between their official duty and their private interest.
- Gifts and hospitality should never be solicited
- The actions of colleagues should not give the impression to other stakeholders, including other colleagues that they have been or may have been influenced by a gift
- Gifts and hospitality should never be accepted in exchange for doing, or promising to do or not to do, something
- Gifts that are cash or cash equivalents, including gift certificates should not be accepted
- Unduly lavish or extravagant, and not otherwise reasonable and customary, hospitality for the circumstances should be refused
- If in doubt about the propriety of accepting a gift or an item of hospitality then it should be refused.

In practice this means that neither you nor any member of your family should accept a gift or hospitality that would, or might appear to, place you under any obligation to the donor, compromise your impartiality or otherwise be considered improper. These principles are of course to be applied with common sense. They are not intended, for example, to outlaw an isolated gift of trivial nature, or an inexpensive Christmas gift such as a diary or calendar.

Hospitality such as the occasional working lunch during the course of an official visit, refreshments, invitations, or tickets provided to events where others are required to pay, individual restaurant meals and/or entertainment, formal occasions accompanied by hospitality e.g. facility openings, awards dinners etc. may be accepted provided:

- They are directly relevant to the invitees work
- They are not in exchange for, or reward for, agreeing to do (or not do) something
- They are not unduly extravagant in the circumstances and:
- It can be shown there is a business benefit for attending



Responsibilities

Responsibility for deciding whether to accept offers of gifts or hospitality lies with colleagues, in consultation with their line manager and with consideration to this policy. If there is any doubt, the only safe course is to politely decline the offer.

Providing Gifts and Hospitality

BTTAD acknowledges that on certain occasions it is necessary to give gifts to other organisations, individuals as recognised etiquette or to colleagues as rewards under a recognition scheme. However giving gifts should not be a regular occurrence and there should be a very good reason for doing so.

Gifts and hospitality should only be given to further the aims of BTTAD and should represent value for money whilst also presenting BTTAD in a favourable light. Gifts and hospitality must never be given with the aim of influencing or rewarding someone for doing, or not doing, something. If you are aware that a person or organisation is considering entering into a business opportunity with, or otherwise do something which could have an effect on the business of, BTTAD, in most circumstances, gifts and hospitality should not be offered to them, especially where they are the decision maker.

Gifts must not be cash or cash equivalents, and gifts and hospitality must not be unduly lavish or extravagant. Hospitality must be given at venues, and be provided in a manner, that would not be harmful to BTTAD's reputation. The process involved in the decision to give gifts or hospitality should be fully transparent and the reason justifiable. Approval to incur gift and hospitality must be obtained from the relevant delegated authority prior to incurring expenditure.

Recording Gifts and Hospitality

BTTAD requires colleagues to complete a Gifts and Hospitality register (which sits with the Secretary). Sufficient detail must be included to ensure that the type of gift or hospitality can be identified. The onus is upon each colleague to declare any gifts and hospitality at the earliest opportunity. It is not the responsibility of BTTAD to seek this out.

Staff should always consider their own reputation and that of the organisation, and they should sensibly record items in the register.