



## **HOSPITALITY, GIFTS & DONATIONS POLICY**

This policy was approved by  
the Management Committee  
of Foyle Women's Aid on

*Date:*

*Signed:*

*To be reviewed: Sept 2019*

# **Foyle Women's Aid**

## **Hospitality, Gifts & Donations Policy**

### **FOYLE WOMEN'S AID GUIDANCE ON THE ACCEPTANCE OF GIFTS, DONATIONS & HOSPITALITY**

#### **1.1 The Purpose**

The purpose of this policy is to enable Foyle Women's Aid and the staff who support them to make clear and consistent decisions regarding the acceptance or refusal of gifts, hospitality and donations.

#### **1.2 Introduction**

This guidance on the acceptance of gifts, hospitality and donations is issued for staff guidance and a standard to be consistently followed.

1. External personnel acting on behalf of Foyle Women's Aid (for example, consultants, contracted staff, non-executive directors etc.) must also abide by these guidelines.
2. This guidance should also be seen as applying to spouses, partners or other associates if it can be argued or perceived that the gift, hospitality or donation is in fact the benefit of the staff member.
3. The guidance does not seek to supply a 'prescriptive list' of the hospitality, gifts or donations that can be provided or accepted, but rather seeks to provide the 'ethical framework' for decision making in relation to provision and acceptance.

#### **1.3 Fundamental Principles**

- Staff should conduct themselves with honesty and impartiality.
- Care must be taken to avoid exposing the individual or the Organisation to allegations of extravagance or impropriety.
- Trade, loyalty or discount cards should be refused or returned to sender.
- Apart from trivial/inexpensive seasonal gifts (such as diaries), no gifts or hospitality of any kind from any source should be accepted by anyone in the procurement or monitoring of a contract.

## **1.4 Record of Gifts, Hospitality and Donations**

Foyle Women's Aid's Finance Manager will maintain a Register of Gifts, Hospitality and Donations, which she will review quarterly with the Director of FWA. It is important to note that all offers, whether accepted or rejected, should be recorded in the Register (**Appendix 2**).

## **1.5 Gifts from Vendors/Contractors**

If gifts are received, the employee must complete the attached Form in **Appendix 3 and submit (email) to their Manager**, who will decide whether to:

- ◆ Use the gift for fundraising purposes/events;
- ◆ Return the gift to the donor with a suitably worded letter (Appendix 4), explaining why the gift cannot be accepted. (The template attached should be tailored to suit each individual circumstance);
- ◆ Use or dispose of the gift, if possible, in or by the Organisation; or
- ◆ Donate the gift.

The Manager will then submit (email the form to the Finance Manager). All employees have the obligation to complete the form for any item gifted, with the exception of inexpensive, trivial gifts, e.g. calendars, diaries and pens.

## **1.6 Gifts from Clients**

Staff adhering to the Policy in relation to accepting gifts and money from women, children and young people and others in accordance with Paragraph 2.7 of the Code of Conduct Policy namely should act sensitively and responsibly when given a gift by a woman, child or young person. Where this happens, staff may accept it where to refuse the gift would give offence.

However, staff should declare it to the Line Manager and follow the policy. If the gift is deemed inappropriate or excessive, staff may be instructed to return it or the gift may be donated to charity.

Staff should not accept gifts in the form of free services from women, children or young people, where such services would normally be charged.

Where possible in the first instance, employees should deter the acceptance of gifts and inform the client that if they still feel strongly and wish to acknowledge or provide a gift, then a small monetary donation to the organisation would be more appropriate.

## **1.7 Cash Gifts**

The general policy is for staff members or volunteers to decline any cash gifts from any individual/client or organisation. In all such cases, the gift should be politely declined unless the giver wished to make it a donation to Foyle Women's Aid.

Cash gifts will be gratefully accepted, acknowledged (unless the donor requests anonymity) and used as unrestricted income by the charity to fulfil its charitable aims, unless the donor asks for the funds to be used in a specific way.

## **1.8 All other Donations Given to Foyle Women's Aid**

All donations to the organisation must be disclosed to enable an up-to-date log to be maintained. Employees should complete the form in Appendix 5 upon receipt of the donation and email to the Finance Manager, who will maintain an up-to-date record. The Finance Manager will present these records to the Director of Foyle Women's Aid on a quarterly basis.

## **1.9 Donating Gifts to Clients**

Where it is decided that gifts will be donated to clients, this needs to be done in a reasonable, fair and consistent manner to prevent client complaints of unfairness or being treated differently to other clients. The Manager is responsible for the fair distribution of gifts and managing the record of same.

## **1.10 Giving of Gifts**

In order to promote its activities, the organisation may, from time to time, distribute corporate gifts (e.g. candles, pens etc.). When ordering or commissioning such gifts, the Director of FWA must approve the purchase order and the Finance Manager will be responsible for the distribution of these gifts and ensuring that recipients are drawn from the approved list of suppliers.

The Director of FWA or a member of the Management Committee may exceptionally authorise the provision of a gift with a value up to £100 to parties who provide services at less than commercial value to the Organisation, e.g. speakers at Foyle Women's Aid events.

## 1.11 Hospitality

The acceptance of what would be appropriate as conventional hospitality (for example, working lunches) should, in the main, cause no problem. Hospitality must not be accepted which would include invitations to frequent or more expensive social functions where there is no direct link to official business (sporting events, the theatre, opera or ballet etc.), particularly where these come from the same source, and those which involve travel, hotel or other subsistence expenses. In deciding whether hospitality can be accepted, staff should complete **Appendix 3** and consider if it:

- ◆ Is likely to help business effectiveness;
- ◆ Places no obligation or perceived obligation on recipients;
- ◆ Is not frequent, lavish or prolonged and the Organisation is not over-represented;
- ◆ Is unconnected with any decision affecting the organisation or the individual offering it;
- ◆ Provides benefits to the Organisation which outweigh the risk of possible misrepresentation of the hospitality; and
- ◆ Can be justified.

### **Conditions attached to hospitality which may/may not be accepted:**

Modest conventional hospitality (e.g. working lunch) supplied by outside vendors does not require approval. In all other cases, prior approval is required from the Director of FWA, for more formal lunch or dinner, by prior invitation.

## 1.12 Roles and Responsibilities of Individual Staff:

It is up to each individual to become familiar with the contents of this policy and to report any offers of gifts, hospitality and donations. **The key rule for employees is not to accept gifts, hospitality or donations from a third party which might be perceived as compromising their personal judgement or integrity.**

In accordance with the Fundraising Policy, Foyle Women's Aid shall attempt to avoid accepting a gift from, or entering into a contract with, a prospective donor which would knowingly place a hardship on the donor or place the donor's future wellbeing in jeopardy. When it is decided that gifts donated are used for fundraising purposes, in particular raffles, in the event the winner does not accept the prize for any reason whatsoever, then the next winner will be offered the prize. In the event the prize is not collected or received, then it will be used for the next fundraising event.

## Appendix 1

Conditions attached to **gifts** which may/may not be accepted and retained: Any gift given to a member of the staff remains the property of FWA and employees have the responsibility to report the acceptance of these gifts to their manager by completing the 'Gift Offer Authorisation Form'. Employees should inform those providing the gifts that it is the organisation's policy to accept the gifts on behalf of the organisation.

<b>Nature of Gift</b>	<b>Conditions</b>
Inexpensive, trivial gifts, e.g. calendars, diaries, pens which bear the Organisation name and/or logo	May be accepted by the employee for their personal use at work
Expensive gifts or gifts of cash, gift cheque	Acceptable (refer to paragraph on acceptance of cash gifts)  Gifts can be accepted on behalf of the Organisation and remain the property of the Organisation. The recipient/employee is responsible for ensuring that all gifts are submitted to be recorded on the Gift Register
Alcohol	Acceptable – on behalf of the organisation and will all be used for FWA fundraising purposes
Trade or discount cards	Not acceptable in any circumstances

REGISTER OF GIFTS/HOSPITALITY ETC

Location: \_\_\_\_\_ Year: \_\_\_\_\_

Date of Offer	Offered to: Name & Grade	Ultimate recipient (if different)	Offered From FWA Client	Offered From Contractor/ Other	Description of Offer	Reason for Offer	Details of Contracts – current or potential	Est. / actual value of offer £	Action Taken i.e. Accepted /Refused/ Returned	Entered by	Entered Date

## Appendix 3

### Part 1 to be fully completed by recipient

<b>Gift/Hospitality Offer Authorisation Form (Part 1)</b>	
Name of Recipient/Employee	
Name of ultimate recipient, if not as above (i.e. if passed on to someone else)	
Date of offer	
Who made the offer	
Description of offer	
Why was the offer made?	
Estimated/actual value of offer	
State whether offer was declined	
Is there a current/potential contract with the donor? If yes, provide details	
Signature of recipient	Signed:  Date:

### Part 2 to be fully completed by the approving Manager

<b>Gift/Hospitality Authorisation Form (Part 2)</b>	
Reasons why approval has/has not been granted	
Is gift being returned? If so, a letter should be issued (template at Appendix 2 to be used)	
Has the gift been used, or used for fundraising? If so, give details.	
Has the gift been donated to a nominated charity?	
Has the Gifts & Hospitality Register been updated?	
Signature of approving Manager	Signed:  Date:
Signature of Finance Manager	Signed:  Date:



## Appendix 4

### Template for Return of Offer of Gift/Hospitality

(The content of this template should be tailored to suit each circumstance)

Contact Name	Foyle Women's Aid
Name of Organisation	
Address of Organisation	Office Address
	Date

Dear

Foyle Women's Aid operates a Gifts & Hospitality Policy to ensure high standards of propriety in the conduct of its business.

On account of public confidence, perception is as important as reality and, because of this, I am obliged to return your offer of INSERT: *Name of gift/hospitality*.

This is not in any way meant to offend or to imply that your (gift/hospitality) was offered in anything but the utmost good faith, but it is designed to protect both individual members of staff and Foyle Women's Aid as an Organisation. I hope you will accept our response in that spirit and that we can look forward to continued effective working relationships.

Yours faithfully,

**Part 1 to be completed by recipient**

<b>Donations Form (Part 1)</b>	
<b>Name of Organisation</b> who presented the donation	(e.g. Tesco)
<b>Name of Employee</b> who accepted the donation on behalf of FWA	
<b>Date of receipt:</b>	
<b>Description of Donation:</b>	
<b>Is this a regular weekly or monthly donation, and has it been agreed by the Manager as to how it should be donated?</b>	
<b>Staff member responsible for the distribution:</b>	
<b>Is there a current/potential contract with the donor? If yes, provide details.</b>	
<b>Signature of recipient</b>	
<b>Date:</b>	

**Part 2 to be completed by the approving Manager & then emailed to the Finance Manager**

<b>Authorisation Form (Part 2)</b>	
Is the Manager satisfied with the distribution of the donation?	
Is the donation being returned? If so, recommend a letter should be issued by Finance.	
Any other details	
Signature of Manager	Signed:
Has the Donations Register been updated?	
Signature of Finance Manager	

**NB: Form not valid unless both Parts 1 and 2 have been completed.**

## **2.1 Provision of Hospitality**

Expenditure on hospitality is increasingly open to both internal and external scrutiny, and Foyle Women's Aid must ensure regularity and propriety of expenditure in relation to hospitality.

The Foyle Women's Aid Hospitality Procedure is summarised below:

1. Hospitality refers to refreshments and entertainment of any type provided out of public funds to anyone;
2. Hospitality should be unostentatious and on a modest scale;
3. The total cost per head, including refreshments, should not exceed £30 (£20 at lunch), of which drinks (soft or alcoholic) should not exceed 1/3 of the total cost;
4. Approval for hospitality should be sought in advance;
5. The approval should address the following:
  - The rationale for extending hospitality;
  - The type of hospitality proposed;
  - The scale and cost of hospitality proposed;
  - The guest list; and
  - The venue.
6. On every occasion, the hospitality extended should be in the direct interest of the organisation and proportionate to that interest; and
7. Those offering hospitality should familiarise themselves with, and adhere fully to, the guidance.