

Gifts & hospitality code for the Chair and Board Members of IPSA

1. Introduction

- 1.1 This Code sets a framework for IPSA's Chair and Board Members and encompasses gifts and hospitality (including working lunches and refreshments).
- 1.2 This Code has been developed in line with IPSA's values of independence, transparency, probity, accountability, and fairness.
- 1.3 Value for money will always be considered when IPSA Members offer gifts or hospitality, as will the value of any gifts or hospitality offered to IPSA Members.
- 1.4 Due to the nature of IPSA's work it is unlikely that expenses to meet the costs of gifts or hospitality will be granted, except in exceptional circumstances.
- 1.5 IPSA's Chair and Board Members must carry out their roles in accordance with [IPSA's Code of Conduct](#) and at all times seek to ensure that they do not put themselves in a position where they may be said to be acting improperly.

2. Monetary limits

- 2.1 In respect of all matters covered in this code, the decision to offer or accept gifts or hospitality is to be made bearing in mind all relevant factors.
- 2.2 The value of any gifts or hospitality offered is an important factor and the Chair and Board Members will not normally give or accept any gifts or hospitality the value of which exceeds £30. Where the amount involved might exceed the £30 limit, the matter will be referred to IPSA's Chair for guidance.
- 2.3 The Chair and Board Members will register any gifts, given or accepted, exceeding £10 in value, unless such gifts involve a Member of Parliament, an MP's staff member, a Member of the House of Lords or Lords' staff, in which case the Member will always register the gift, unless any such persons have a previously established personal relationship with the Chair or a Board Member, and the gift is not connected to their work for IPSA.

3. Recording and reporting

- 3.1 IPSA's Chair and Board Members are responsible for completing a [Gifts and Hospitality Form](#) for any gifts or hospitality given or received in their capacity as Members of IPSA. IPSA's Secretariat will publish and maintain a [Gifts and Hospitality Register](#) which will detail all such gifts and hospitality.
- 3.2 It will be a matter for each Board Member of IPSA to judge whether a gift or any entertainment or hospitality received is in his/her capacity as a Board Member of IPSA. Where it is unclear, or where there is some doubt, whether a gift or any hospitality received was received in whole or in part as a result of their position as Board Member of IPSA, the Board Member should notify and seek advice from the Chair or Chief Executive.

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3.3 The Gifts and Hospitality Register will be published bi-annually on IPSA’s website.

4. Gifts

4.1 A gift is defined as “something which is voluntarily given without the expectation of receiving anything in return”. Gifts can include gift vouchers and similar items, such as entitlement air miles. This section sets out IPSA’s policy towards the giving and receiving of gifts.

Principles

4.2 The general principles for the acceptance of gifts are set out below:

- the gift must normally be of a nominal or notional value and not exceeding £30
- the gift must be given for an appropriate reason
- the gift must be given at an appropriate time (for example, not in advance of an award or contract), and
- the gift must be of a one-off or irregular nature, such that it could not be viewed as a regular source of income by HM Revenue & Customs

4.3 If in doubt, the question whether to accept a gift should be referred to the Chair or Chief Executive.

Receiving gifts

4.4 Control over the acceptance of gifts must be stringent. IPSA’s Chair and Board Members must be seen to act with honesty and integrity and must not put themselves in a position where they could be said to be acting improperly. The acceptance of gifts from interested parties could create a conflict of interest that might arguably compromise the impartiality of the Chair and Board Members in the decisions that they are required to make.

4.5 For this reason, where the Chair or a Board Member of IPSA receives any gift of any value, from a Member of Parliament, an MP’s staff member, a Member of the House of Lords or Lords’ staff, that gift will be registered.

4.6 Due to the nature of IPSA’s work, any offers of gifts from any parties with a commercial relationship with IPSA should be refused.

4.7 If the Chair or Board Members suspect that a gift is offered with the intention to bribe or otherwise influence, they must report the matter to the Chair or Chief Executive as soon as possible. Acceptance of a gift in these circumstances will constitute gross misconduct and could result in removal from post.

4.8 If in doubt, the question whether to accept a gift must be referred to the Chair or Chief Executive. The Chair or Chief Executive may, in exceptional circumstances, depart from the principles set out above, at paragraphs 4.2 and 4.3, where they are able to demonstrate that the needs of IPSA justify it – taking account of any risk to its reputation. An example of this

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might be where a visiting foreign dignitary offers a gift, and to refuse it would cause offence. Approval for the acceptance of a gift should be sought as soon as the gift is offered.

- 4.9 In reaching a decision whether to accept a gift, IPSA's Chair and Board Members will consider whether the gift should be put to another use (for example, donated to charity or a library or displayed in public) and the possible risks to the reputation of IPSA associated with keeping the gift. Donating a gift to the giver's preferred charity where appropriate would avoid any question of conflict of interest in the choice. It is not permissible to solicit a gift on the basis that it will go to charity.
- 4.10 No gifts may be sold or exchanged for monetary or personal gain.

Providing gifts

- 4.11 It would not normally be appropriate for IPSA's Chair and Board Members to give official gifts. Should the question of giving such a gift arise, the following matters must be considered:
- the circumstances giving rise to the consideration of giving the gift, including any relevant factors to the potential recipient
 - the justification for the gift in terms of IPSA's objectives
 - a description of the gift, and
 - the cost of the gift (which should be modest, and, where possible, should not exceed the value of the gift received when it is reciprocal)
- 4.12 When a dignitary provides a service at an official event it may be appropriate to provide a small gift or memento (for example, a bouquet of flowers, or a small commemorative gift).

Recording gifts given or received

- 4.13 Any offer of a gift, whether accepted or not, to the Chair or Board Members in their IPSA capacity exceeding the £10 reporting limit must be noted on the Gift and Hospitality Form, together with any supporting documents, and an entry made in the Gifts and Hospitality Register.
- 4.14 All gifts offered or received must be recorded in the Gifts and Hospitality Register (see paragraph 3.1) which is published biannually on [IPSA's website](#).

Reciprocal gifts

- 4.15 Such gifts are not encouraged. However, there may be circumstances where the failure to give a gift could cause offence.
- 4.16 An example would be an official visit by a foreign official whose custom would be to give or receive a token of friendship or respect. In these circumstances, a Gifts and Hospitality Form must be completed as above.

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5. Hospitality

- 5.1 Hospitality includes the provision of lunches, dinners, and tickets to sporting, social or leisure events. These examples are not exhaustive.
- 5.2 IPSA's Chair and Board Members will not ask or encourage individual business contacts, representative bodies, companies, or other organisations, to provide hospitality to them or indirectly to other colleagues, friends, or relatives.

Principles

- 5.3 The general principles for the acceptance of hospitality are equivalent to the general principles for the acceptance of gifts, set out in paragraphs 4.2 and 4.3.
- 5.4 If in doubt, the question whether to accept hospitality must be referred to the Chair or Chief Executive.

Accepting offers of hospitality

- 5.5 When deciding whether to accept hospitality, each offer must be considered on its merits within the principles set out in this policy.
- 5.6 It may be considered appropriate to accept an offer of hospitality (for example, a working lunch) if it is:
- not lavish in nature
 - offered in the course of an official visit
 - not a regular occurrence, and
 - there is no suspicion of a conflict of interest
- 5.7 If IPSA's Chair and Board Members are at all unsure about whether accepting hospitality would give rise to a conflict of interest, they should refuse the hospitality.
- 5.8 Where the Chair or a Board Member of IPSA receives hospitality of any value, from a Member of Parliament, an MP's staff member, a Member of the House of Lords or Lords' staff, such hospitality will be registered and published in the Gifts and Hospitality Register, unless any such persons have a previously established personal relationship with the Chair or a Board Member, and the hospitality does not concern any matters relating to IPSA.
- 5.9 Due to the nature of IPSA's work, any offers of hospitality from any parties with a commercial relationship with IPSA should be refused.
- 5.10 Should IPSA's Chair and Board Members accept hospitality in good faith, and subsequently discover that concerns might be raised, they must inform the Chair or Chief Executive and make an appropriate entry in the Gifts and Hospitality Register.

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- 5.11 The Chair and Board Members must undertake to complete a gifts and hospitality form along with any supporting documentation, whenever hospitality exceeds a value of £10, so that an entry can be made in the Gifts and Hospitality Register.

Providing Hospitality

- 5.12 It is permissible to provide hospitality in the form of refreshments (non-alcoholic beverages) and/or working meals for internal and external participants where value for money in the pursuance of IPSA's objectives can be demonstrated.
- 5.13 The Chair and Board Members must ensure that value for money in the pursuance of IPSA's objectives can be demonstrated before making their decision in each case.
- 5.14 It is not necessary to record the provision of routine hospitality in the Gifts and Hospitality Register. However, if the hospitality could be seen as exceptional – for example, for large numbers of people when the total cost is significant or the cost per head is higher than appropriate given the context – then it must be recorded.

6. Away Days and Team Building Events

- 6.1 These are occasional events organised to develop working relationships. Such an event may be acceptable as long it can be justified as providing good value for money and can demonstrate development achievements. Any costs incurred must be reasonable and comparable to the status of the event, and must be registered.

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