



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 staying connected, seeing the bigger picture, doing the right thing, being open, and making a difference.
- 1.3 Value for money will always be considered when Board Members offer gifts or hospitality, as will the value of any gifts or hospitality offered to Board 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, other than in exceptional circumstances; and never in cases involving the provision of alcohol.
- 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 considered to be acting improperly.
- 1.6 Where the Chair and Board Members are under any doubt as to whether a gift or hospitality has been provided to them in their capacity as a representative of IPSA; whether to accept a gift or hospitality, the matter should be raised with the Chair (or the Chief Executive in the case of the Chair).

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 has or might exceed the £30 limit, Board Members will refer the matter to the Chair for guidance (or the Chief Executive in the case of the Chair).
- 2.3 The Chair and Board Members will register any gifts, given or accepted, exceeding £10 in value, unless the gift cannot reasonably be construed as being in relation 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 exceeding the value of £10 given or received in their capacity as Board Members of IPSA. IPSA's Chief of Staff will maintain a Gifts and Hospitality Register

Gifts & Hospitality Code for the Chair and Board Members of IPSA

which will detail all such gifts and hospitality. Details of this register will be published bi-annually on IPSA's website.

- 3.2 It will be a matter for each Board Member of IPSA to judge whether a gift or hospitality received is in his or her capacity as a Board Member of IPSA.

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:
- 4.2.1 The gift must normally be of a nominal or notional value and not exceeding £30;
 - 4.2.2 The gift must be given for an appropriate reason;
 - 4.2.3 The gift must be given at an appropriate time (e.g. not in advance of an award or contract); and
 - 4.2.4 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.

Receiving Gifts

- 4.3 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 considered 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.
- 4.4 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, unless the gift cannot reasonably be construed as being in relation to their work for IPSA.
- 4.5 Due to the nature of IPSA's work, any offers of gifts from any parties with a commercial relationship with IPSA should be refused.
- 4.6 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 the Chief Executive in the case of the Chair) as soon as possible. Acceptance of a gift in these circumstances will constitute gross misconduct and could result in removal from post.
- 4.7 The Chair or Chief Executive may, in exceptional circumstances, depart from the principles set out above, in paragraph 4.2, where they are able to demonstrate that the needs of IPSA

Gifts & Hospitality Code for the Chair and Board Members of IPSA

justify it – taking account of any risk to its reputation. An example of this 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.

4.8 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 (e.g., 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.

4.9 No gifts may be sold or exchanged for monetary or personal gain.

Providing Gifts

4.9 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:

4.9.1 The circumstances giving rise to the consideration of giving the gift, including any relevant factors to the potential recipient;

4.9.2 The justification for the gift in terms of IPSA's objectives;

4.9.3 A description of the gift; and

4.9.4 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).

4.10 When a dignitary provides a service at an official event it may be appropriate to provide a small gift or memento (e.g., a bouquet of flowers, or a small commemorative gift).

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.

5.3 Board members must also consider public perception of the type of event being provided as hospitality. It should not be political, contentious, or threaten to bring IPSA into any form of disrepute.

Principles

5.4 The general principles for the acceptance of hospitality are equivalent to the general principles for the acceptance of gifts, set out in paragraph 4.2.



Gifts & Hospitality Code for the Chair and Board Members of IPSA

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 (e.g., a working lunch) if it is:
 - 5.6.1 Not lavish in nature;
 - 5.6.2 Offered in the course of an official visit;
 - 5.6.3 Not a regular occurrence; and
 - 5.6.4 There is no suspicion of a conflict of interest.
- 5.7 The points made in paragraphs 4.4 to 4.7 apply equally to considerations of offers of hospitality.

Providing Hospitality

- 5.8 It is permissible to provide hospitality in the form of refreshments and/or working meals for internal and external participants where value for money in the pursuance of IPSA's objectives can be demonstrated. The provision of alcohol is strictly prohibited.
- 5.9 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.
- 5.10 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.

April 2026