



## Gifts and Hospitality Code

### Chair and Members

#### 1. INTRODUCTION AND GENERAL PRINCIPLES

This Code sets a framework for IPSA's Chair and Members and encompasses gifts and hospitality (including working lunches and refreshments). This Code has been developed in line with [IPSA's values](#), the Nolan principles of public life, and the principle of value for money

IPSA's Chair and 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. It will be a matter for each Member of IPSA to judge whether a gift or any entertainment or hospitality received is in their capacity as a 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 Member of IPSA, the Member should notify and seek advice from the Chair or Chief Executive.

#### 2. GIFTS – MONETARY LIMITS & RECORDING

##### Definition

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.

##### General principles

- the gift must normally be of a nominal or notional value not exceeding £30
- the gift must be recorded by declaration to the Board Secretary if its value exceeds £10 or any value if offered by or given to an MP, MP staff member, Member of the House of Lords or their staff, whether accepted or not
- such gifts above this threshold or gifts meeting the parliamentary condition above will be published in IPSA's Gifts and Hospitality Register
- the gift must be given for an appropriate reason
- the gift must be given at an appropriate time (e.g., not in advance of an award or contract)
- 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
- any doubt as to the appropriateness of the gift should be referred to the Chair by Board Members or the Chief Executive by the Chair

- where, following this consultation, doubt persists, the gift should be rejected or not be offered unless, considering all the circumstances, this may cause offence or damage to IPSA's reputation (see details below)

### Value

The value of any gifts offered is an important factor and the Chair and Members will not normally give or accept any gifts exceeding £30 in value. Value for money must always be considered when accepting gifts. Where the amount involved might exceed the £30 limit, the matter will be referred to IPSA's Chair or CEO for guidance.

### Receiving Gifts – Parliament

IPSA's Chair and Members must act and 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 Members in the decisions that they are required to make. For this reason, where the Chair or a Member of IPSA is offered or accepts any gift of any value from an MP, an MP's staff member, a Member of the House of Lords or Lords' staff, that gift must be recorded and published. As above, gifts exceeding £30 in value, whether in isolation or cumulatively, should not ordinarily be accepted.

### Receiving Gifts – Commercial

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

If the Chair or 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 may constitute gross misconduct and could result in removal from post. It may also be a criminal offence.

### Receiving Gifts – General

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 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 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.

In reaching a decision whether to accept a gift, IPSA's Chair and 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. No gifts may be sold or exchanged for monetary or personal gain.

### Providing Gifts

It would not normally be appropriate for IPSA's Chair and Members to give official gifts and, as such, it is unlikely that expenses to meet the costs of gifts will be granted, except in exceptional circumstances and in consultation with the Chair and Chief Executive. Such exceptional circumstances where providing a gift may be appropriate must be considered stringently in light of the following factors:

- 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 and reciprocity of the gift (which should be modest, and not exceed the value of the gift received when it is reciprocal).

Non-exhaustive examples of this may include when a dignitary provides a service at an official event and in which it may be appropriate to provide a small gift or memento (e.g. a bouquet of flowers, or a small commemorative gift). Invitations to events or services in an official and wholly IPSA capacity may also be covered on each case's merits, as well as accepting or offering a gift to a foreign official whose custom may mean offence would be caused by refusing or not providing a gift. In these limited circumstances, it may be appropriate for the cost of the gift to be charged to the official business card registered with the CEO Office.

### Recording

The Chair and Members will record, by declaring to the Board Secretary, any gifts offered to or by Board members, in isolation or with other gifts and whether accepted or not, if they exceed £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 this case, the Member will always record the gift unless any such persons have a previously established personal relationship with the Chair or a Member, and the gift is in no way connected to their work for IPSA. It is again noted that gifts exceeding £30 in value, individually or collectively, should not ordinarily be accepted, and will be published if circumstances justified their acceptance.

### Register

Such gifts required to be recorded will be added to the Gifts and Hospitality Register by the Board Secretary. This will be published periodically on IPSA's website.

## 3. HOSPITALITY – MONETARY LIMITS AND RECORDING

### Definition

Hospitality includes the provision of lunches, dinners, and tickets to sporting, social or leisure events. These examples are not exhaustive. IPSA's Chair and 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.

## General Principles

the principles applying to gifts policy, aside from the monetary limits, also apply to hospitality, whether given or received and whether accepted or not. Monetary limits for hospitality are instead provided below. Due to the nature of IPSA's work, any offers of hospitality from any parties with a commercial relationship with IPSA should ordinarily be refused.

## Receiving Hospitality – Appropriateness, Recording, and Publication

It may be considered appropriate to accept an offer of hospitality (e.g., a working lunch) if it is a) not lavish in nature, b) offered in the course of an official visit, c) not a regular occurrence; and d) there is no suspicion of a conflict of interest. If IPSA's Chair and Members are at all unsure about whether accepting hospitality would give rise to a conflict of interest, they should refuse the hospitality.

Where the Chair or a Member of IPSA receives hospitality of more than £5 from a Member of Parliament, an MP's staff member, a Member of the House of Lords or Lords' staff, such hospitality must be recorded and will be published in the Gifts and Hospitality Register, unless any such persons have a previously established personal relationship with the Chair or a Member, and the hospitality does not concern any matters relating to IPSA. This limit is £10 if the party offering hospitality is non-parliamentary, unless a pre-existing commercial relationship exists (in which case, the offer should ordinarily be refused). Such hospitality above this threshold, whether accepted or not, should be recorded and published.

Should IPSA's Chair and 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.

## Offering Hospitality – Appropriateness, Recording, and Publication

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. The Chair and Members must ensure that value for money in the pursuance of IPSA's objectives can be demonstrated before making their decision in each case.

IPSA's Chair and Members are permitted to use IPSA funds (either through claiming expenses or funded through the business card registered to the Chief Executive's Office) to purchase modest and proportionate hospitality for a Member of Parliament, an MP's staff member, a Member of the House of Lords or Lords' staff, or other external visitors, only so long as the purchase accords with value for money and other requirements set out in this policy, and is solely and necessarily related to the conduct of official IPSA business. Board members should seek the view of the Chair in advance of any such expenditure, whilst the Chair should consult the Chief Executive.

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 high then it must be recorded.

### Board Meetings and Away Days

If Board members are required to attend a formal meeting of the Board, or its committees, which extends from the morning into the afternoon of the same day, it will be considered acceptable for IPSA to provide modest and proportionate hospitality for Board members, or to allow Board members to claim expenses for refreshments which they have purchased themselves. This also applies to away days or team-building events – sessions organised to develop working relationships.