



Gifts and Hospitality Policy

Purpose

The Parliamentary Works Sponsor Body (“Sponsor Body”) accepts that employees, agency/interim workers, contractors, Board and Committee members may be offered gifts and/or hospitality. We want to provide guidance on what to do when these are offered, if their acceptance or provision will give the impression of, or cause influence, whilst acting in an official capacity.

We want to ensure transparency and conformity to relevant laws and protect everyone working for or representing the Sponsor Body from potential or actual conflicts of interests.

Scope

The Bribery Act 2010 is intended to stop the giving, offering, soliciting, or receiving of financial advantages; gifts and hospitality; which could create an obligation or expectation on the recipient. Sponsor Body employees, agency/interim workers, contractors, Board and Committee members must comply with this policy, to prevent situations intended to induce improper conduct, which could lead to bribery and disciplinary action under the Disciplinary Policy or Sponsor Board Code of Conduct.

Principles

Sponsor Body employees, agency/interim workers, contractors, Board and Committee members must not accept gifts or hospitality, or receive other benefits, which could reasonably be perceived as influencing their decision-making, compromise their integrity, or damage the reputation of the Sponsor Body, the Restoration and Renewal Delivery Authority, the two Houses of Parliament or related bodies. Acceptance of any gifts and/or hospitality may also be in breach of the Bribery Act 2010.

Gifts and hospitality may be accepted with the approval of a Director or the Chief Executive Officer (or the Chair of the Sponsor Board in relation to the Chief Executive Officer). When accepting a gift and/or hospitality the recipient should consider the intention behind the **offer**, its **value and timing**. If rejecting a gift and/or hospitality may cause an offence to the giver, the intended recipient should discuss it, as soon as practicable, with a Director or the Chief Executive Officer or the Chair of the Sponsor Board.

The rules and thresholds for non-registration or registration of gifts and/or hospitality are:

- a. Gifts which bear the donor’s name or insignia retained by the Sponsor Body, and not the individual they were intended for, do not have to be registered.
- b. Gifts or hospitality worth £25 or less, do not have to be registered if there are no conflicts with the principles of this policy.
- c. If there is doubt as to the amount of a gift or hospitality, then it should be registered.
- d. If it is worth £25 or more and has been turned down it should be registered.
- e. If it is worth £25 or more, seek authorisation from a Director (or in the case of Board/Committee members, the Chief Executive Officer) before accepting (as an exception) and register it.



External events and entertaining:

- f. Gifts and hospitality received while on official business as part of a delegation visit or a Board or Committee do not have to be registered (as an exception) but personal gifts must be registered as per above. The Expenses policy will apply for making any claims.
- g. Free receptions and lunches offered by suppliers or potential suppliers, or tickets to events, should be turned down except where there is a clear business advantage.
- h. Attendance at annual dinners of organisations may not be appropriate and must be authorised in advance by a Director or the Chief Executive Officer or the Chair of the Sponsor Board. The rules on what is included in the Register of Interests apply as they do to gifts and hospitality.

Internal events:

- i. Funding of working lunches or refreshments from the Sponsor Body budgets is only allowed if authorised by the Chief Executive Officer, e.g. away days, meetings, etc.

Gifts to, and hospitality for, visitors must be authorised by the Chief Executive Officer:

- j. Gifts can be exchanged with visitors, provided by the Sponsor Body at a cost of no more than £25 per individual gift;
- k. Hospitality in pursuance of the Sponsor Body business objectives for external participants is allowed if the expenditure is reasonable.

Gifts, and hospitality, from potential suppliers or individuals:

- l. Gifts and hospitality must not be accepted from potential suppliers or individuals, who are competing to provide services to the Sponsor Body or the Delivery Authority.

Implementation

The Finance and Corporate Services Director keeps a Register of Gifts and Hospitality. Any gifts or hospitality that do not fall within the exceptions above must be **registered within 14 working days of receipt**. In addition, an email should be sent to

SponsorBodyHR@r-r.org.uk marked 'Gifts and Hospitality', copied to the Director, Chief Executive Officer or Chair of the Sponsor Board if they have authorised acceptance.

A disregard for the principles in this policy by an employee, agency/interim worker or contractor may be managed under the Disciplinary policy, if necessary, or, in the case of a Board or Committee member, the Sponsor Board Code of Conduct.

Review

The Finance and Corporate Services Director, working with the Human Resource team, will review the Gifts and Hospitality Register, and the Register of Interests, raising any potential issues with the Chief Executive Officer or Chair of the Sponsor Board as appropriate.

The Gifts and Hospitality Register will be published on a quarterly basis in the interest of transparency.



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This policy will be reviewed annually, over the life of the Restoration and Renewal Programme, or sooner if there is a specific legislative, regulatory or service requirement or a change in practice to support the improvement of this policy.

Sarah Johnson
On behalf of the Sponsor Body
July 2020