



**The British  
Psychological Society**

Promoting excellence in psychology

## **GIFTS AND HOSPITALITY POLICY**

For use by	All Society staff; all Members undertaking activities on behalf of the Society.
Owner	Director of Finance
Date of Approval by PC	24 April 2012
Dates of consultation with Trade Union Representatives	
Date of Approval by JNC	5 October 2012
Launch Date	January 2013
Contact – Comments	Personnel Department
Review Date	First year review then every three years. (2013/2017)

## 1. Introduction

- 1.1. Under the Bribery Act 2010 (Act) it is an offence for employees to:

**Pay bribes:** to offer or give a financial or other advantage with the intention of inducing that person to perform a relevant function or activity improperly or to reward that person for doing so; and/or to

**Receive bribes:** to receive a financial or other advantage intending that a relevant function or activity should be performed improperly as a result.

**Fail to prevent bribery:** an organisation is guilty of an offence if an associated person, ie someone who performs services on behalf of the organisation, bribes another person intending to obtain or retain business or a business advantage.

“Relevant function or activity” includes any function of a public nature and any activity connected with a business. The employee performing the activity is required to perform it in good faith or impartially or be in a position of trust. Conviction under the Act is punishable by imprisonment for a maximum term of 10 years.

- 1.2. In certain circumstances, these offences could be committed as a result of a gift being accepted by a friend or relative as well as by a member of staff.
- 1.3. This policy should be read in conjunction with those listed in 7.1.

## 2. Aims

- 2.1. To provide guidance to staff and Members on the action that should be taken in the event that they are offered gifts or hospitality
- 2.2. To ensure that staff and Members understand their responsibilities within the law.
- 2.3. To promote a culture of integrity and transparency.

## 3. Scope

- 2.1. This policy applies to all staff employed by the Society and all Members undertaking activities on behalf of the Society.

## 4. Receipts of Gifts and Hospitality Guidance

### 4.1. Casual Gifts

- 4.1.1. Any gift or offer of a gift other than one of low intrinsic value (see 4.1.2.) must be declared and entered on to the Gifts and Hospitality Register held by the Director of Finance.

- 4.1.2. Casual gifts from suppliers or others, e.g. at Christmas time, must not be in any way connected with the performance of duties. Items of low intrinsic value (less than £20) such as diaries and other items of work related stationery and equipment may be accepted and need not be recorded in the Register.
- 4.1.3. In all other cases advice must be sought from your line manager (or the Chief Executive in the case of Members) and in no case, may a gift be accepted without prior written approval of the Chief Executive. If a gift falls outside of identified small value items and arrives without warning, it must be handed over to the appropriate Department Manager or Chief Executive (in the case of Members) who will decide whether the gift should be returned (or passed on to a charity or good cause) and will ensure that the donor is informed of what has happened.

## **4.2. Cash**

- 4.2.1. Under no circumstances must staff or Members accept personal gifts of cash.

## **4.3. Hospitality**

- 4.3.1. All offers of hospitality should be approached with caution.
- 4.3.2. Modest hospitality, for example, a drink and sandwich during a visit or a working lunch is normal and reasonable and does not require approval of a manager or the Chief Executive (in the case of Members).
- 4.3.3. Other offers of hospitality which are unrelated to the Society's business, for example, relating to theatre evenings, sporting fixtures, or holiday accommodation, must be declined.
- 4.3.4. There is an important difference between, for example, attendance in an official capacity at a function organised by a public body or related to the Society's business, which in general would be regarded as acceptable, and accepting hospitality from a private individual or firm standing to benefit from the goodwill of the Society which would contravene this Policy. Particular care must be taken when dealing with contractors, developers and firms or individuals in a comparable position.

## **5. Offering gifts and hospitality**

- 5.1. Any expenditure on gifts must be authorised by the Chief Executive and any gifts authorised will be of relatively low value.
- 5.2. The Society reserves the right not to reimburse expenditure on gifts that are purchased without authorisation.
- 5.3. Authorisation will only be forthcoming exceptionally and will normally only be considered in relation to the marking of special occasions relating to other psychological organisations with which the Society has a formal relationship.

- 5.3. Hospitality offered on the Society's behalf which exceeds the limits defined on the Society's Expenses Claim Form must have a clear justification and be pre-authorised by the Chief Executive or a member of the Senior Management Team.

## **6. Breaches of Policy**

- 6.1. Failure to comply with the above requirements will be deemed as a disciplinary matter and breaches of the policy by members of staff will be handled in accordance with the Society's Disciplinary Policy and Procedure.
- 6.2. Breaches by Members acting on behalf of the Society will be handled in accordance with the Member Conduct Rules.
- 6.3. Where it is suspected or proven that actual fraud has taken place, the Society will involve the Police, Charity Commission and other bodies as appropriate.

## **7. Related policies**

- 7.1 This policy should be read in conjunction with the:
- Whistleblowers Policy
  - Anti-Fraud Policy & Procedure
  - Anti Bribery Policy and Procedure
  - Expenses Policy \*
  - Financial Procedures and Internal Control Manual \*
  - Disciplinary Policy and Procedures \*
  - Declaration of Interests Policy and Procedures
  - Anti-Money Laundering Policy
  - Member Conduct Rules

*\* update/approval ongoing*