

## Gifts & Hospitality Policy

### 1. Purpose

This policy sets out the procedure trustees, staff and volunteers must follow when giving or receiving gifts and hospitality.

The aim of this policy is to protect both the organisation and the individuals involved from any appearance of impropriety. Accordingly, we are asking trustees and all staff to declare any gifts or hospitality offered and received in connection with their role in DanceSyndrome. A declaration of form is provided for this purpose, listing the types of interests you should declare.

### 2. Scope

This policy applies to trustees, volunteers and full time and part time staff. Staff includes freelance and subcontracted staff.

### 3. Policy Statement

You must declare all offers of gifts and hospitality, made to or by you, regardless of value, in your role as a member of DanceSyndrome staff. All such offers must be declared whether accepted or declined. Offers of gifts and hospitality may include items ranging from diaries, wall charts, and boxes of chocolates, to free international travel and accommodation. Declarations must be recorded on DanceSyndrome's Gifts and Hospitality Register (the register).

The register is maintained by the Managing Director and is publicly available, on request.

It is your responsibility to ensure that you are not placed in a position that risks, or appears to risk, compromising your role or DanceSyndrome's public and statutory duties. You should not be seen to be securing valuable gifts and hospitality by virtue of your job. You should not accept or provide any gift or hospitality if acceptance/provision will give the impression that you have been influenced/are deemed to be influencing while acting in an "official capacity".

This Policy also applies to spouses, partners or other associates if it can be argued or perceived that the gift or hospitality is in fact for the benefit of the official. In exercising judgement as to whether to accept a gift or hospitality, the question should be asked what public perception would be if the information was published given your role and circumstances.

### 4. Receiving gifts

**Office address:**

**DanceSyndrome**  
C/O Pathway Associates  
Suite 2, Waterside,  
St James Court West,  
Accrington, Lancashire,  
BB5 1NA

**Telephone:** 07597 942494  
**Email:** info@dancesyndrome.co.uk  
**Website:** dancesyndrome.co.uk  
**twitter:** @Dancesyndrome  
**facebook:** dancerleddisabilityinspired

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Registered in England and Wales  
**Social Enterprise**  
and company limited by guarantee  
**Company No: 8402154**

You may retain all gifts valued at £50.00 or under, whether given in recognition of presentations or otherwise.

For gifts exceeding a value of £50.00 the following options are suggested:

- share the gift with all staff;
- raffle the gift for charity;
- donate the gift to charity; or
- make a donation to charity and keep the gift.

### **5. Accepting offers of hospitality – genuine business reasons**

Hospitality offered should only be accepted where there is a direct link to working arrangements and a genuine business reason can be demonstrated, for example:

- attendance or speaking at a conference, which provides complimentary subsistence,
- travel and accommodation (this does not need to be declared on the register except where a gift was received, see paragraph 4);
- attending at a free training course; or
- attending a drinks reception to network.

It is recognised that, in the course of carrying out your duties, you will need on occasion to ensure good relationships with existing and future contractors and stakeholders and that this may involve for example, the receipt of modest working lunches and dinners. These are acceptable where there is a genuine business reason.

Hospitality invitations to events which are purely social events should be considered very carefully before accepting; in such circumstances it may be much more difficult to substantiate a genuine business reason. You are expected to use annual leave for such events. You may not accept free holidays from a current or potential contractor. These invitations should be recorded in the register whether received or declined.

### **6. Gifts and hospitality offered by DanceSyndrome**

DanceSyndrome staff must be mindful that the value of all gifts and hospitality offered by DanceSyndrome are sourced from charitable funding, and the expectation is that such funding will be used for legitimate purposes and demonstrate value for money.

In exceptional circumstances it may be appropriate for DanceSyndrome to provide a gift of up to £40.00 in value, for example:

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- providing a bouquet of flowers to a seriously ill employee, or to a longstanding employee who is retiring;
- giving book tokens to someone who spoke at a DanceSyndrome conference free of charge; and
- making a contribution towards staff Christmas festivities.

It is acceptable for DanceSyndrome to provide modest hospitality in the way of working lunches and/or dinners to existing and potential contractors and stakeholders subject to a genuine business reason.

## **7. Declaration**

You should make your declaration as soon as possible after the offer or receipt of gifts or hospitality. All declarations are to go to your PA/Team PA in the required format as shown below. PAs/Team PAs will record the declarations in the register. The register is an annual document and will be maintained on a calendar year basis and reported quarterly at Board Meetings. It is recommended that you make your declaration by email to [info@dancesyndrome.co.uk](mailto:info@dancesyndrome.co.uk) and retain a copy for your personal records.

Your declaration will need to include the following information:

- date of offer of gift or hospitality, and date of event where relevant;
- name, job title and organisation of recipient / provider;
- nature and purpose of gift or hospitality received or declined;
- the name of any other organisation involved;
- estimated value.

You should consult the Managing Director for any guidance required on this Policy. In general terms, if you have any doubt about whether an item should or should not be declared, you are advised to declare it.

All payments or benefits in kind to trustees will be declared in the charity's accounts and annual report, with amounts for each trustee listed for the year in question.

## **8. Monitoring**

The register will be reviewed quarterly by the Board of Directors.

Staff will be reminded periodically of their requirement to declare gifts and hospitality provided/accepted/declined in accordance with this Policy.

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## **9. Policy breach**

Staff who fail to declare the acceptance/provision/decline of hospitality and gifts in accordance with this Policy may be subject to disciplinary action under DanceSyndrome's Discipline Policy.

This policy will be reviewed annually and amended when necessary. It may also be reviewed should any new, relevant legislation require this.

Date of implementation: January 2019

Date of next review: November 2020

Signed:  .....

**Sue Blackwell, Acting Chair – DanceSyndrome – 01.11.2019**

An easy read version of this policy is available at <http://www.dancesyndrome.co.uk/policies>

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## Declaration of Gifts/Hospitality Form

I ..... as employee/trustee/volunteer\* [\*delete as appropriate] of DanceSyndrome have set out below my interests in accordance with the organisation's gifts and hospitality policy.

Category	Please give details of the gift/hospitality (including the value and reason for gifting) and whether it applies to yourself or, where appropriate, a member of your immediate family, connected persons or some other close personal connection
Gifts or hospitality offered to you by external bodies and whether this was declined or accepted in the last three months.	
Gifts or hospitality offered by you to external bodies and whether this was declined or accepted in the last three months.	

To the best of my knowledge, the above information is complete and correct. I undertake to update as necessary the information provided, and to review the accuracy of the information on a quarterly basis. I give my consent for it to be used for the purposes described in the gifts and hospitality policy and for no other purpose.

Signed:

Position:

Date:

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