



### **Anti-Bribery Policy 2020 – Gifts and Hospitality**

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<b>Policy review</b>	<b>March 2021</b>
<b>Policy updates</b>	

### **Introduction - Purpose and scope of the Policy**

Parks for London is committed to conducting its business with honesty, integrity, openness and accountability. It recognises that any involvement in bribery is illegal and will have adverse implications for the Charity both legally and reputationally.

This policy applies to staff, volunteers and trustees and applies to all the charities processes and dealings with supporters and other connected organisations.

The purpose of this policy is to provide clear guidance, so that staff and trustees understand what to do when offered gifts or hospitality and when it may be acceptable and appropriate to offer them. This Policy seeks to clarify what is reasonable and bona fide in relation to gifts and hospitality and what is not. Donations are not covered here; staff and trustees should refer to Parks for London's Internal Financial Controls & Procedures [section 2.3] for guidance.

The general principle of receiving or giving gifts and hospitality should be one of transparency and disclosure. The offer of gifts and hospitality should always be unsolicited

### **2. Definition of Bribery**

The Bribery Act defines bribery as giving or receiving a financial or other advantage in connection with the "improper performance" of a position of trust, or a function that is expected to be performed impartially or in good faith.

Bribery does not have to involve cash or an actual payment exchanging hands and can take many forms such as a gift, lavish treatment during a business trip or tickets to an event.

### **3. Receiving Gifts and Hospitality**

#### **3.1 When gifts and hospitality should be declined**

In some circumstances, it is fine to accept a gift or hospitality, from an organisation or individual, whilst conducting charity business. They should not be accepted under the following circumstances:

- If in accepting either gifts or hospitality, there is a sense of obligation or perception of a bribe
- It is not in the charity's interest to accept
- The activities of the organisation or person making the offer, conflict with the aims and objectives of the Charity
- The gift is cash or equivalent such as vouchers
- The gift or hospitality is solicited
- Social invitations [i.e. from supporters or organisations the Charity has a close working relationship or legal agreement with] unless there is a clear business case to accept in the interest of the Charity; such as maintaining a positive working relationship or it would cause offence not to accept. In such cases, no other circumstances listed under 3.1 can apply.

- Free holidays or lavish hospitality from a supporter or organisation the Charity has a close working relationship or legal agreement with.

Declining any gifts or hospitality should always be done with the utmost courtesy and where necessary this policy can be referred to. If a member of staff is unsure as the best way to make the declination they should seek advice from the CE or Chair of the Board.

### **3.2 When Gifts can be accepted and when they need to be declared.**

Where none of the circumstances under 3.1 apply:

-A gift of low intrinsic value [it's worth is not more than £25] such as: a seasonal gift or a box of chocolates or biscuits; or a promotional gift from a supplier such as a diary, calendar or pens, do not need to be declared or have prior permission to accept.

-Any gifts above the value of £25 and less than £50, do need to be declared and the member of staff or trustee should seek permission from the CE or Chair of the Board to accept.

-Gifts above £50, need to be declared, advice from the CE or Chair of the Board will need to be sought as to the most appropriate course of action.

-Situations where to decline a gift would harm Parks for London's relationships or its reputation can be accepted but must be declared. Staff should seek guidance from the CE or Chair of the Board if they need clarity in such a circumstance.

### **3.3 When Hospitality can be accepted and when they need to be declared**

Where none of the circumstances under 3.1 apply:

-Hospitality received at a workshop, training or seminar etc, such that all delegates are given i.e. corporate and not personal hospitality does not need to be declared.

-Attendance at an event, paid by a third party that is relevant to Parks for London's business need not be declared, but permission to attend should be sought by a manager to ensure it is for charity business.

-Modest hospitality offered at business meetings such as refreshments, breakfast or lunch need not be declared.

-Overnight accommodation can be accepted, where it is to attend an event for charity business and travel on the day would not be possible, but it must be declared.

-Situations where to decline hospitality would harm Parks for London's relationships or its reputation can be accepted but must be declared. Staff should seek guidance from the CE or Chair of the Board if they need clarity in such a circumstance.

### **4.0 Giving gifts and offering hospitality**

-Modest gifts (not exceeding £30) may be bought using Charity funds under some circumstances, for example:

- A volunteer has done an exceptional piece of work for Parks for London
- A professional has offered services to Parks for London on a pro bono basis
- A college has made a venue available for a PFL event

All such gifts must first have approval by the CE and Hon treasurer, to ensure they are in line with PFL policies. Gifts cannot be given in cash or equivalent. All gifts made should be declared.

-Modest hospitality maybe provided during business meetings such as refreshments and lunches, such spend does not need to be declared but it must be in line with limits outlined in PFL's Internal Finance Procedures and Controls [refer to sections 3.8.1 and 3.8.2].

-PfL will, during the course of its work, facilitate workshops, launches, seminars and similar for its supporters and other organisations with an interest in green infrastructure. At these events, it is acceptable to provide refreshments and lunches. Such expenditure will be planned and approved in advance by the Board in the annual budget and do not need to be declared. Where such expenditure is not in the budget and exceeds £1,000 the procedures outlined in 3.2 of the Internal Financial Controls and Procedures should be followed.

### **5.0 Raising a Concern**

If a member of staff or a trustee has concerns about a gift(s) or hospitality received or offered that may represent a breach of the Policy, they should report it to the CE or Chair of the Board. All such information will be treated in confidence or it may be reported in accordance with PfL whistle blowing policy.

Staff and trustees should also consult the CE or Chair of the Board if they have any questions about the interpretation or application of this policy.

### **6.0 Declaring a Gift or Hospitality**

-These should be declared to the Admin and Finance Manager by email, whether they are accepted or declined, as soon as possible and not longer than a week after receipt; unless as outlined in 3.2 or 3.3 they do not need to be declared.

-The declaration should include the following:

- Date of receipt
- Who it is from
- What is the item and estimated value
- Is permission or advice required to accept the gift/hospitality.

-Declarations will be published in a gifts and hospitality register, which will be reviewed annually by the Board, in March each year.

### **7.0 Law**

Staff and trustees must comply with the Bribery Act 2010. A full copy of the bribery Act and explanatory notes can be found [here](#).