



## CSP COUNCIL AND COMMITTEES GIFTS & HOSPITALITY POLICY

### Purpose

1. This policy sets out the CSP procedure for receiving gifts and hospitality. It covers:
  - a. CSP Council and committee members; and
  - b. CSP members and others holding a formal governance role e.g. members of a Country Board or a short-life working group.
2. A 'gift' is an item that is for the personal use of the recipient.
3. 'Hospitality' is the provision of food, drink, accommodation or an event which no payment, or minimal payment, is made by the recipient.

### Policy Statement

4. You must declare all offers of gifts and hospitality, made to you, regardless of value, in your role as a CSP Council, committee member or employee. 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.
5. Declarations must be recorded in the CSP's Gifts and Hospitality Register (the "Register"). The Register is maintained by the Head of Governance.
6. It is your responsibility to ensure that you are not placed in a position that risks, or appears to risk, compromising your role or the CSP's vision and strategy. You should not be seen to be, or perceived to be, securing gifts and hospitality by virtue of your CSP role. You should not accept any gift or hospitality if acceptance/provision will give the impression that you have been influenced/are deemed to be influenced while acting in an "official capacity".
7. 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 CSP Council or committee member or employee.
8. In exercising judgement as to whether to accept a gift or hospitality, the question should be asked what CSP members' perception would be if the information was published given your role and circumstances.

9. For gifts exceeding a value of £40, the following options are suggested:
  - a. decline the gift if this will not cause offence;
  - b. share the gift with CSP members or staff;
  - c. raffle the gift for charity;
  - d. donate the gift to charity; or
  - e. make a donation to charity and keep the gift.

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

10. 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:
  - a. 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);
  - b. attending at a free training course; or
  - c. attending a drinks reception to network.
11. 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 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.
12. 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 may not accept free holidays from a current or potential contractor.
13. These invitations should be recorded in the Register whether received or declined.

### **Declaration**

14. You should make your declaration using the format laid out in the Register as soon as possible after the offer or receipt of gifts or hospitality.

<b>Description of gifts or hospitality</b>	<b>Received from (name, position &amp; organisation)</b>	<b>Approx Value £</b>	<b>Reason given for providing gift/ hospitality</b>	<b>Recipient name</b>	<b>Date of receipt</b>	<b>Accepted/ Declined/ Other</b>
Lunch at LaLa restaurant	Josh Sargeant Sales Director, AAA Consultancy	£40	Discussion of plans for forthcoming conference	John Smith	10.01.18	Accepted
2 bottles of champagne	Fizzy Gillespie Event Manager ZZZ Consultancy	£60	Hosting professional event	Jane Doe	02.02.18	Shared with regional network members.

*Approved by the Governance Working Group: January 2018*