

Gifts and Hospitality Policy

1 Purpose

- 1.1 Symposium Mammographicum Ltd (SympMamm) is a Company Limited by Guarantee and a charity. It was incorporated on 15 February 1985 (company number 01886866) and given charitable status on 11th June 1985 [charity number 291982), though it has operated since 1979.
- 1.2 Best practice in line with Principle 3 (integrity) of the Charity Governance Code for smaller charities recommends that “Registers of interests, hospitality and gifts are kept and made available to stakeholders in line with the charity’s agreed policy on disclosure. SympMamm’s Gifts and Hospitality Register is reported to the Board of Trustees as a standing agenda item, along with the Charity’s Declaration of Interests Register

2 Scope

- 2.1 This policy applies to all Trustees, volunteers, direct contractors and agents of SympMamm. This policy applies to gifts or hospitality either offered from or offered to third parties (e.g. individuals, organisations or companies outside the charity). The policy does not apply to the following:
 - Hospitality at events / conferences / training etc that (a) you have paid a standard fee to attend where hospitality costs are included or (b) are free to attend and open to all.
 - Hospitality you may receive from the charity in the course of your work, e.g. working lunches.
 - Internal gifts or hospitality, e.g. a one-off thank you gift for a Trustee / volunteer. Such gifts are from direct contributions from Trustees and not from charity funds. These do not need to be reported and recorded on the Gifts and Hospitality Register.
- 2.2 This policy does not cover ‘Gifts in Kind’. Gifts in Kind are where the charity might be offered goods or services as donations, rather than cash, for example use of imaging equipment for workshops / meeting room space at a conference.
- 2.3 This policy does not cover receipt of cash donations to the charity. Receipt of cash donations is governed by the charities fundraising policies and procedures. Please refer to the Acceptance and Refusal of Donations Policy and/or contact the fundraising team for information.

3 Definitions

- 3.1 Gifts are physical objects (including cash) offered by a person or organisation outside the charity to a person or team within the charity. Gifts are categorised as follows:
 - Category A: little or no intrinsic value - these items are under £10 in value, for example, pens or notebooks given out at conferences.
 - Category B: estimated intrinsic value £10-£50 - for example, flowers, a bottle of wine, etc.
 - Category C: gifts valued over £50 - for example, a case of wine or expensive hamper.
 - Category D: gifts from a person or organisation with which you know we are considering entering a contract; any gift of cash which is not a donation to the charity.
- 3.2 Hospitality could be travel, accommodation, food, drink, entertainment, or a cultural or

sporting event. In the context of virtual events, hospitality could be food or drink sent to be consumed during the virtual event (e.g. a hamper).

4 Key policy principles

- 4.1 All offers of gifts and hospitality (except category A gifts) must be declared to the Board Secretary or co-Chair, regardless of whether they are being accepted or declined. Trustees / Volunteers / Board Secretary must complete a form in order to log the gift or hospitality on the Gifts and Hospitality Register.
- 4.2 The Board Secretary will maintain the Gifts and Hospitality Register.
- 4.3 Before accepting or offering any gifts or hospitality, you must consider whether doing so is in the direct interest of the charity and proportionate to that interest. When considering this, think about whether a fair-minded member of the public, knowing the facts of the matter, would see anything improper or suspicious in the gift or hospitality being offered or received. If you have any doubts, you should contact the Board Secretary for advice or simply refuse.
- 4.4 Likewise, if you are in any doubt of the likely value of any gift or hospitality the details should be shared with the Board Secretary for inclusion in the Gifts and Hospitality Register.

5 Offers of gifts or hospitality made by third parties to staff or volunteers

	Can accept	Report to / approved by	Record on G&H Register	Additional notes
GIFTS OFFERED BY THIRD PARTIES				
Category A (little or no intrinsic value)	Yes	No	No	If you receive repeated category A gifts from the same source in a single year you must report these to the Board Secretary.
Category B (£10-£50 intrinsic value)	Yes (raffle or share)	Board Secretary	Yes	
Category C (over £50 intrinsic value)	No (raffle / donate)	Board Secretary (gifts over £100 approved by Co-Chair / Company Secretary)	Yes	On occasions it may be difficult to refuse a high value gift (e.g. an international delegation and refusal would cause offence) in these cases the gift should be raffled / donated.
Category D (see 2.1)	No	Board Secretary	Yes	Must not be accepted in any circumstances. Gifts of cash which are not donations to the charity must never be accepted.
HOSPITALITY OFFERED BY THIRD PARTIES				
Conventional hospitality (such as a working lunch/dinner or overnight stay).	Yes	Board Secretary	Yes	The value of all such hospitality must be reasonable in the circumstances.

Occasional events like annual dinners of an organisation you work with or working lunches during a visit for work purposes	Yes	Board Secretary	Yes	The total cost of the hospitality must be reasonable. The cost should not be more than £100. You need to be sure that the event could not be seen as an attempt to influence your work for the charity.
Virtual hospitality in circumstances where conventional in-person would have been accepted.	Yes	Board Secretary	Yes	Should not include items that cannot reasonably be consumed during the event - such items should be considered gifts and dealt with as such.
Hospitality over £100 or frequent invitations	Within limits	Board Secretary / Company Secretary / Co-Chair (or Trustee if Co-Chair is recipient of the hospitality)	Yes	Any event or or hospitality over £100 in value must be approved by your director in advance (your staff contact can arrange this if you are a volunteer). If you are receiving frequent invitations to events you should speak to your director. Two Trustees approval is required for any hospitality over a value of £500 for any Trustee/ Board Secretary in a calendar year.

6 Offering gifts or hospitality to third parties

- 6.1 One-off gifts of a trivial nature may be offered to third parties where it is normal and reasonable. For example, a box of chocolates may be given to a speaker.
- 6.2 Conventional hospitality may also be offered to third parties where again it is normal and reasonable in the circumstances. For example, a Trustee may offer to pay for lunch when meeting with one of the charity's stakeholders to discuss the work of the charity.
- 6.3 You should not offer gifts or hospitality to others working or seeking to work with the charity.
- 6.4 If you use your own money to pay for a gift or hospitality, you may claim back the money spent through the normal expenses process and subject to the monetary limits stated.

7 Responsibilities

- 7.1 The following responsibilities apply in relation to this policy:
- The Board of Trustees owns this policy and is responsible for approving changes and updates.
 - The Board Secretary is responsible for ensuring the policy is regularly reviewed and updated; for ensuring declarations are logged appropriately on the registers; and reported to the Board of Trustees at each meeting.
 - All Trustees and volunteers are responsible for reporting offers of gifts or hospitality to the Board Secretary as required by this policy.

8 Monitoring, compliance and review

- 8.1 The Board Secretary will monitor the Gifts and Hospitality Register and submit this each year to the Board of Trustees.
- 8.2 The policy will be reviewed every three years (or when necessary) and approved by the Board of Trustees
- 8.3 Trustees and Volunteers who have not acted in line with this policy will be investigated under our problem-solving policy and may face suspension or dismissal from volunteering.

9 Related documents

Fraud, Bribery and Corruption Policy
Conflict of Interests Policy

Document information

Initial contact point, Andrew Tillbrook, Board Secretary, Andrew.tillbrook@sympmamm.org.uk

Policy drafted	June 2024
Trustee approval	Sept 2024
Policy review	Sept 2026
Policy updates	



Annex - Gifts and Hospitality register form

Name:

Date of completion:

Date of offer	Description of gift or hospitality	Category A, B, C or D	Organisation or person offering gift or hospitality	Was the gift/ hospitality accepted or rejected? Please include date	Was the gift donated to the ICO raffle or consumed?	Any additional notes

Please add additional lines if necessary

When completed, send this form to andrew.tillbrook@sympmamm.org.uk to allow the gift or hospitality to be recorded.