

Gifts and Hospitality Policy

This gifts and hospitality policy explains the standards and behaviour required of our staff and partners to comply with the expectations of Evolve - Foundation for International Legal Assistance (Evolve) and the Bribery Act 2010.

About this Policy

- 1.1 We expect excellent standards of conduct from everyone and this includes being open and transparent about gifts and hospitality provided or received.
- 1.2 Gifts include any item of value provided to a third party or their employees or received from a third party by us or our staff (see table below for definitions of value).
- 1.3 Hospitality includes any business entertaining, such as travel, accommodation, meals and invitations to events given to Evolve or its staff by third parties or given by Evolve or its staff to third parties.
- 1.4 In this policy, a reference to Evolve's staff includes anyone who volunteers for Evolve.

2. Scope

- 2.1 This procedure applies to all our staff.

3. Objective

- 3.1 To provide clear guidance.
- 3.2 To state our requirements concerning the giving and acceptance of gifts and hospitality.
- 3.3 To ensure that our staff do not exploit their position for personal benefit.

4. Associated documents

- 4.1 Anti-Corruption and Bribery policy
- 4.2 Whistleblowing policy
- 4.3 Conflicts of Interest policy

5. Principles concerning bribery and gifts

5.1 We discourage staff from accepting or giving gifts or hospitality. We accept that the occasional modest giving and acceptance of gifts and hospitality may be a legitimate contribution to maintaining relationships. However, it is essential that they do not influence, nor could be perceived as influencing Evolve’s decision making. We must all consider whether the giving or receiving of a gift or hospitality is appropriate.

It is prohibited to offer or receive gifts or hospitality that could influence or be perceived as capable of influencing the outcome of transactions or decisions relating to our charity.

6. Procedure for receiving gifts or hospitality

6.1 In principle, we do not encourage staff to either give or receive gifts from third parties. In particular, gifts that are excessively lavish or which are conditional on particular behaviours or conduct should be returned. Money and financial instruments may never be accepted. Gifts should be returned to the third party with an explanation to the effect that it is not our policy to accept gifts.

We recognise, however, that declining a gift may cause some offence. When considering whether to accept or decline a gift, please use the table below and ensure the correct procedure is followed.

Benefit received	Procedure
Small gift (branded), below £25 ¹ (includes diaries, calendars, pens and so on)	Individuals may accept. No approval required, but do report in attendance note.
Small gift (non-branded), below £25 (includes diaries, calendars, pens and so on)	Individuals may accept. No approval required (but report in attendance note) unless two or more gifts are received within a six-month period, in which case notify the trustees.
Gifts exceeding £25 (includes bottles of champagne, spirits, tokens, vouchers, presents and so on)	For all gifts exceeding £25 the following steps apply: Where the value is between £25 and £100: inform the trustees and surrender the gift. Where the value is over £100, obtain written approval from Tanya Murshed, surrender to the trustees and record.

¹ The thresholds in this table apply equally whether in pounds sterling or Ugandan shillings.

<p>Hospitality (such as lunches, dinners)</p>	<p>Ensure that the hospitality is reasonable, proportionate, not lavish and that the organisation would be willing to reciprocate.</p> <p>For all hospitality accepted the following steps apply:</p> <p>Where the value is £50 or less, then it should be reported to the trustees and recorded.</p> <p>Where the value is over £50, you must also obtain prior written approval from Tanya Murshed.</p>
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- 6.2 Approvals must be in writing, which may include email.
- 6.3 Staff should record gifts and hospitality in accordance with Evolve’s Anti-Corruption and Bribery Policy.
- 6.4 When determining the monetary value of a benefit you must consider market value. If no monetary value can be placed on a benefit then consider if accepting it could create a conflict of interest or be perceived to be inappropriate and seek guidance from the trustees.
- 6.5 We discourage giving gifts to third parties. In determining whether giving a gift is appropriate, consideration should be given to the recipient, the value of the gift and the reason for it.
- 6.6 Hospitality may be offered if it is reasonable in all the circumstances to do so and is proportionate and not lavish or extravagant.
- 6.7 No gift or hospitality that may amount to or cause the recipient or giver to commit a criminal offence can either be given or accepted. Take care not to accept or give a gift or arrange or accept hospitality that could cause offence to others or damage the reputation of Evolve.

7. What steps do I take when giving gifts?

- 7.1 In general, gifts should not be given to beneficiaries or potential beneficiaries, third parties or anyone outside Evolve. The exceptions to this rule are modest refreshments and hospitality. If you are in doubt as to whether a gift or hospitality should be given, please seek advice from the trustees.
- 7.2 It is essential that the following steps are taken when giving gifts or hospitality:

- (a) Gifts or hospitality given must be pre-approved by the trustees.
- (b) All benefits must be recorded with details of the individual or customer to whom it was provided.
- (c) Gifts and hospitality given must be consistent with the policy of the applicable third party organisation.
- (d) There is an enhanced risk that gifts or hospitality provided to foreign public officials may be construed as a bribe, in these circumstances, pre-approval must be given by the trustees.

8. Where do I go for help or advice?

8.1 If you would like further advice please contact the trustees.

Reviewing the policy

Evolve's trustees will review this policy every year, or when legislation changes.

Next Review Date: January 2021