

## **GIFTS & HOSPITALITY POLICY**

### **1. Policy Statement**

- 1.1. This policy addresses the offering and acceptance of gifts and hospitality by REACT colleagues. This policy focuses on the important role that our stance on recording these matters in a gifts and hospitality register plays in ensuring transparency and compliance with our values which incorporate expectations of honesty, integrity, and building trust .
- 1.2. This policy applies to all REACT colleagues (that is employees, casual workers, volunteers, contractors and trustees) and its subsidiary REACT Group Solutions (RGS).

### **2. Introduction and Purpose**

- 2.1. Good governance in organisations and in particular public bodies or charities recognises the need for guidance around how we manage gifts and hospitality. As a charity regulated by the Charity Commission, we must be vigilant about the risk that accepting or giving gifts or hospitality may affect our decision-making and how our behaviour might be perceived. Having appropriate policies in place helps determine how we should act in these situations. The purpose of this policy is to ensure that all colleagues are aware of our corporate and individual responsibilities in relation to gifts and hospitality, to protect the reputation of the organisation and its colleagues against the risks, either real or perceived, of fraud, corruption, bribery and reputational damage.
- 2.2. This policy applies to colleagues carrying out our work both in UK and Overseas activities. Colleagues should be particularly vigilant when working in or with countries where the culture surrounding gifts and hospitality is different from our own.
- 2.3. Any employee or office holder who breaches this policy may be subject to the Managing Performance or Disciplinary Policy. Separate but similar policies apply to volunteers and contractors.

### **3. Principles**

- 3.1. Through our values and statement on the behaviours that underpin our values, REACT is committed to establishing and applying appropriate standards of regularity and propriety, and requires all colleagues at all times to act honestly and integrity, and to safeguard the resources of the charity for which they are responsible. All

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colleagues are expected to adhere to the REACT Codes of Conduct.

3.2. REACT is committed to creating and maintaining positive cultures and behaviours, fostering an environment which enables colleagues to operate effectively in line with the objectives of our organisation, and to provide confidence to the wider public, stakeholders, beneficiaries, and regulators that the organisation is being managed effectively and transparently.

3.3. Gifts and hospitality (offered or received by employees or volunteers actively deployed) must be:

- appropriate – justified and relevant to the event.
- proportionate – neither excessive nor regular.
- transparent – openly accepted, approved and recorded in the register of Gifts and Hospitality, and made available for review.

This policy and its application will be scrutinised by the Director of People & Resources, the Board, appointed auditors, or the Charity Commission. Adherence will ensure that REACT activities are compliant with legal and ethical requirements, and related policies.

#### 4. Definitions

4.1. A gift is defined as “something voluntarily donated, with no preconditions and without the expectation of any return.” Branded merchandise and promotional items are part of core public engagement, marketing and advertising activities and are not considered gifts.

4.2. Hospitality is defined as “the act or practice of being hospitable; the reception and entertainment of guests, visitors, or strangers, with liberality and goodwill.” Normal REACT business and governance activities do not constitute hospitality and are out of scope of this policy.

4.3. Normal REACT Business and Governance Activities in this context are defined as events, meetings or occasions linked to REACT standard business, where the sole or primary focus is forwarding our purpose, vision, aims, and objectives internally or externally. Activities not classified as hospitality include governance activities such as Board, committees and volunteer meetings or engagement, other internal meetings, and colleague events, including associated meals and accommodation; public engagement and external affairs events including receptions; marketing and advertising activities; professional conferences, industry conferences, seminars and similar; team away days, internal meetings, and events.

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## 5. Offering Gifts and Hospitality on behalf of REACT

- 5.1. It is not the usual policy of REACT to offer gifts or hospitality in the normal course of business. However, where there is a clear business need, offering low value (trivial - less than £25 per head) gifts and hospitality on behalf of REACT is permitted. Offering gifts or hospitality above this value would be considered exceptional.
- 5.2. The cost of all gifts and hospitality offered must be proportionate, established beforehand and recorded.
- 5.3. Low value gifts and hospitality offered on behalf of REACT should be approved and signed off in advance by the relevant budget holder.
- 5.4. Any higher value gifts and hospitality, sometimes offered for cultural reasons, should be approved and signed off in advance by your Director and recorded on the register.
- 5.5. Branded merchandise and promotional material offered as part of normal REACT public engagement, marketing and advertising activities should follow agreed financial limits and normal lines of authorisation. The cost of individual items would usually be trivial. They do not constitute gifts and do not need to be declared on the register. Examples of branded merchandise that might be offered are, t-shirt, hat, pens, notebooks clearly bearing our name or logo.
- 5.6. Expenditure on normal business and governance activities is not considered hospitality and does not need to be declared on the Gifts & Hospitality Register. Costs should be proportionate to the event, established beforehand and subject to agreed financial limits and normal lines of authorisation. Care should be taken when recording expenditure to use the correct Account codes and done in collaboration with Finance.
- 5.7. The Director of People & Resources will monitor the cumulative spend on gifts and hospitality on behalf of the CEO to ensure compliance with internal financial controls.
- 5.8. Prizes awarded by REACT are regarded as part of public engagement, marketing and advertising activities (recognition awards, competition prizes) and are usually based on excellence/achievements or are linked to specific programme activities. They are part of normal business and will have internal spending controls applied. They are not considered to be gifts and are out of scope of this policy. Prizes not associated with excellence or the activities above should follow the Gifts and Hospitality policy.

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## **6. Receiving Gifts and Hospitality on behalf of REACT**

- 6.1. It is not the normal policy of REACT to accept gifts or hospitality, and these should be politely declined where possible.
- 6.2. There may however be occasions when to refuse a gift or hospitality would cause offence. In these circumstances, and where a gift or hospitality cannot be returned or refused, they may be accepted.
- 6.3. All colleagues are responsible for ensuring that any offers of gifts or hospitality worth £25 or more, whether accepted or declined, are recorded on the register and signed off by their line manager. Employees should however be vigilant about the risk that accepting such invitations may affect decision-making and how our behaviour might be perceived. If in doubt, if the motives behind an invitation are unclear, there is undue lavishness, or if you detect a regularity in the invitations, they should be recorded on the register.
- 6.4. Colleagues should consider propriety and standards of behaviour and responsibilities when deciding whether to accept or decline gifts and hospitality. Colleagues should not use their authority or office for personal gain and should always seek to uphold and enhance the standing and reputation of REACT and its values and code of conduct.
- 6.5. Gifts of a trivial nature (less than £25) can be retained by the individual. All others must be passed onto HQ or your Director, who will arrange for such gifts to be shared with all colleagues or teams, displayed or raffled at an appropriate time.
- 6.6. Gifts and hospitality should not be accepted where they may appear to be disproportionately generous or regular, for example if the cumulative value from any one organisation or individual, or to one team member from multiple sources, exceeds £100 in any 12-month period. Gifts and hospitality, however low the value, should not be accepted if it could reasonably be construed as an inducement to affect a business decision, create a conflict of interest or might arguably compromise the impartiality of staff.
- 6.7. **Remember – if it makes you feel uncomfortable, or you are not sure – report it.**

## **7. Procurement**

- 7.1. Care should be exercised by decision-makers and other employees participating in procurement or funding decisions and processes. Colleagues in these roles should not under any circumstances accept non-trivial gifts or hospitality from suppliers or

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potential suppliers due to the possibility of a real or perceived conflict of interest. Separate policy, advice and training is provided for colleagues responsible for Procurement.

## 8. Recording Gifts and Hospitality

- 8.1. All colleagues have a personal responsibility to ensure that an audit trail exists for all gifts and hospitality offered and received by REACT (whether accepted or declined) are recorded in the register.
- 8.2. The Gifts and Hospitality Register is accessed via Box/admin/gifts and hospitality -It is the responsibility of all colleagues to record their gifts and hospitality information on the register promptly at this location. If for any reason this is not possible, they should submit their records on the stand-alone register template to the Director of People & Resources. Non-executive board and council members and other external colleagues with no access to the file should submit through the relevant secretariat.
- 8.3. If there is any potential conflict of interest related to gifts or hospitality, these must be reviewed with the line manager and mitigating actions recorded on the register. If required, a Conflicts of Interest declaration should be updated and submitted to the Director of People & Resources.
- 8.4. Any offer of a bribe or commission should be reported immediately in accordance with the Counter Fraud and anti-Bribery statement. The offer or acceptance of a bribe may constitute an offence contrary to the Bribery Act 2010.
- 8.5. Where there is any uncertainty about the value or status of a gift or hospitality offered it should be assumed that it exceeds the £20 threshold and it should therefore be recorded in the register. ***In cases of doubt there should always be a presumption in favour of disclosure in the register.***
- 8.6. The REACT Finance Manager will maintain an overview of declarations, for example identify any patterns, test compliance and ensure CEO gift limits are not exceeded.
- 8.7. All colleagues should refer to the Conflict-of-Interest Policy and the Fraud and Anti Bribery Policy for further information.

## 9. Reporting Concerns

- 9.1. Colleagues should report any concerns relating to adherence to this policy to their line manager as soon as possible, or to the Director of People & Resources if they are

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reluctant to discuss with their line manager.

9.2. If the colleague feels unable to raise their concerns internally, they may raise them using the REACT Whistleblowing Policy.

## 10. Training

10.1. All new colleagues will be made aware of the policy, register and any additional guidance during their induction, which will also be published and updated from time to time.

### 1. Policy Review

1.1. This will be reviewed annually, or more frequently if required, for example where there is a breach or changes made to relevant UK legislation. The review will ensure the policy remains up to date as well as assessing the effectiveness of how the policy is working in practice and taking action to address any identified issues.

Review date February 2026

Next review February 2027

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