

RE:ACT GIFTS AND HOSPITALITY POLICY

INTRODUCTION

RE:ACT values its reputation for ethical behaviour and is committed to carrying out its business fairly, honestly and transparently. As a charity we must ensure financial probity and reliability and be able to demonstrate that. We believe that we should NOT receive benefits of any kind from third parties which might reasonably be seen to compromise our ability to do that.

This policy applies to all persons working for us or on our behalf, including trustees, employees at all levels whether permanent or temporary, volunteers, interns, contractors, external consultants, third-party representatives and business partners. The policy applies to all processes and to any dealings with any customers, beneficiaries, partners and suppliers.

The aim of this policy is to help RE:ACT members understand what to do if they are offered gifts and hospitality, and to provide a clear framework to ensure that all relevant parties understand what constitutes bribery, corruption, or exposes the charity to accusations (founded or unfounded) of unethical or unlawful behaviour.

BRIBERY

A Bribe means a financial or other inducement or reward for action which is illegal, unethical, a breach of trust or improper in any way. Bribes can take the form of money, gifts, loans, fees, hospitality, services, discounts, the award of a contract or any other advantage or benefit.

Bribery includes offering, promising, giving, accepting or seeking a bribe. All staff, volunteers and other parties as set out in the introduction above have a responsibility to help in the prevention, detection and reporting of bribery.

Specifically, RE:ACT members must not:

- give or offer any payment, gift, hospitality or other benefit in the expectation that a business advantage will be received in return, or to reward any business received
- accept any offer from a third party that you know or suspect is made with the expectation that we will provide a business advantage for them or anyone else
- knowingly fail to challenge or report suspicions of bribery or corruption

For full details please refer to RE:ACT Anti-Bribery Policy.

GIFTS AND DONATIONS RECEIVED

RE:ACT in deciding whether to accept or decline a donation or gift will consider the charity's best overall interest and will not accept donations from donors whose activities appear to be in direct conflict with our charitable aims and objectives.

A RE:ACT member or any member of their family/friends should not, directly or through others, solicit or accept money, gifts, hospitality or anything else that could influence or reasonably give the appearance of influencing the relationship with that organisation or individual.

RE:ACT will not take gifts from organisations or individuals who participate in activities which:

- could cause detriment to the charity's reputation
- will disproportionately decrease the amount of donations to further the work of the charity.
- undermine our vision and values
- are personal gifts to RE:ACT members, which should be discouraged at all times
- are from unknown sources of funding. RE:ACT will take reasonable steps to determine the ultimate source of funding for each gift and satisfy itself that the funds do not derive, directly or indirectly, from activity that was or is illegal.
- potentially harm our relationships with other donors, service users, stakeholders or volunteers.
- expose us to undue adverse publicity or reputational risk.
- require unacceptable expenditure or additional charity resources.

If a gift is received by a member which may not be acceptable under the terms of this policy, the CEO must be alerted at the earliest opportunity. This will be researched further and the matter will be referred to the Trustees Board if appropriate with the necessary information regarding the donation.

DONATIONS AND GIFT IN KIND PROCESSING

All donations or gifts must be conveyed to the Director of Business Operations or the Development Team at the earliest possible opportunity accompanied by all original correspondence pertaining to the donation or gift. Entries must be made against the appropriate organisation or individual on Salesforce or a new opportunity created recording the amount or an estimated value if it is a gift/gift in kind. The entry should contain the following info:

- If the gift is from other than an individual i.e. corporation, organisation, charitable trust, etc. a contact name and job title should be reported in addition to that of the company

- Date received
- Amount received/description of gift
- Whether any restrictions have been applied by the donor and for which operation or project
- Any reporting requirements
- Date an acknowledgement (if required) has been sent

Audit trail

The original documentation that accompanied the donation must be retained for audit purposes. An acknowledgement should be sent by the Development Team unless the donor wishes to remain anonymous. It is everyone's responsibility to inform the Development Team when a donation or gift is received. It is the responsibility of the Development Team to record and ensure acknowledgement of receipt of all donations and gifts.

Gifts offered personally to staff or volunteers

Both staff and volunteers will come into contact with individuals or organisations that may wish to offer support. Common sense will need to be applied in some cases:

- Conventional hospitality (such as a working lunch/dinner or overnight stay) may be accepted where it is normal and reasonable in the circumstances. For example, when speaking at an event, staff may accept food paid for by the organiser and in some cases the offer of accommodation but the value of this should be reasonable in the circumstances. Volunteers deployed on operations may be offered accommodation and food and again this should be proportionate, for the benefit of all and recorded in the Daily Operational Sitreps sent to the Operations Team.
- One-off gifts of a trivial nature may be accepted where it is normal and reasonable, for example, a box of chocolates may be given following a speaking event. Before accepting any gifts or hospitality individuals 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, then speak to a RE:ACT Director for advice, or simply - politely - refuse. As a guide, all gifts or hospitality which exceed a notional value of £10.00 should be reported to HQ. These will then be included as part of the monthly accounts and will be entered correctly onto Salesforce.

Cash donations

Volunteers may accept cash donations to RE:ACT's charitable funds as long as the cash is banked by the charity and a receipt is issued. Gifts of cash to individual staff/volunteers and not to RE:ACT's charitable funds should always be politely refused.

REPORTING

If any member is concerned about a gift that has been given or accepted which may represent a possible breach of this policy, they should report it as soon as possible to a RE:ACT Director or the CEO who will treat any such information in confidence or if applicable report it in accordance with the RE:ACT Whistleblowing Policy.

POLICY REVIEW

This policy will be reviewed annually, or sooner if there has been a breach. The review will ensure the policy remains up-to-date in line with UK legislation and best practice, as well as assessing the effectiveness of how the policy is working in practice and taking action to address any identified issues.