



## ICRIR Gifts and Hospitality Policy – draft

### 1. Introduction

- 1.1 The ICRIR Code of Conduct sets out the values that all staff and Commissioners should follow. In particular, the values of integrity and impartiality include ensuring that no gift, hospitality or other benefit is accepted which could reasonably be perceived to undermine or in any way call into question the proper conduct of staff or Commissioners. This policy regulates how all gifts and hospitality offered to or proposed from ICRIR officers or staff are authorised or declined according to the values of the Code of Conduct.
- 1.2 This policy outlines the process to be followed in the event of the offering of a gift or hospitality to any Commissioner, officer or member of staff of, secondees to or those otherwise engaged by the Commission and for the provision of hospitality, where appropriate.

### 2. Key principles

- 2.1 ICRIR Commissioners, officers and staff must never solicit the offer of any gift or hospitality, or any other benefit in any way connected to, or arising from their role with the ICRIR, whether on or off duty.
- 2.2 During the course of their duties, ICRIR officers and staff may occasionally be offered gifts and hospitality which could not reasonably be perceived to compromise their judgement or integrity. Examples include the provision of light refreshments as a common courtesy at meetings, inexpensive promotional products from conferences, or discounts aimed at wider public sector workers.
- 2.3 Gifts given by colleagues for other colleagues (e.g. relating to retirement/birth of child/marriage/promotion) are not within the scope of this policy. But gifts given by those outside the organisation even for these reasons are within scope.
- 2.4 The following considerations will assist ICRIR officers and staff in determining the boundaries of acceptability of any gift or hospitality:
  - a) **Genuine:** Is this offer made for reasons of genuine appreciation for the situation or for something I have done. Why is the offer being made, what are the circumstances, have I solicited this offer in any way (including implicitly), or does the donor feel obliged to make this offer?
  - b) **Independent:** Would the offer or acceptance, be seen as reasonable in the eyes

of the public? Would a reasonable bystander be confident I could remain impartial and independent in all of the circumstances?

- c) **Free:** Could I always feel free of any obligation to do something in return? How do I feel about the propriety of the offer? What are the donor's expectations of me should I accept?
- d) **Transparent:** Would I be comfortable if my acceptance of this offer was transparent to the Commission, colleagues and to the public, or was reported publicly? What could be the outcome for the Commission if this offer was accepted or declined?

2.5 The approval of any gifts and hospitality in line with the provisions of this policy is delegated to the Head of Governance and Board Secretary, or another member of the Executive Committee as required. Approvals for members of the Executive Committee may only be given by the Chief Executive Officer, and for the CEO by the Chief Commissioner. Decisions relating to the Chief Commissioner and other Commissioners will be for the Lead Non-Executive Commissioner, on advice of the CEO.

2.6 Entries must be made in the ICRIR Gifts and Hospitality Register in line with the provisions of this policy, and in a timely manner. The Register will be reviewed by the Executive Committee on a regular basis, and entries for Commissioners and the Executive Committee will be reviewed by the Audit and Risk Committee. For Commissioners, entries from the Gifts and Hospitality Register where a Gift or Hospitality has been accepted will be published on a 6 monthly basis.

### 3. Acceptance and Provision of Gifts

3.1 The general position of the Commission is that gifts **WILL NOT BE ACCEPTED**. Offers of gifts or hospitality should be courteously refused, in a manner that does not cause offence or embarrassment to either the organisation or the individual making the offer. The fact of an offer should be recorded in the Register and the manner in which it was declined (verbally, writing etc).

3.2 In the event that it is considered that a refusal would cause unnecessary offence or embarrassment, or otherwise result in significant reputational damage to the Commission, then acceptance may be possible, subject to the following conditions: -

- The accepting officer(s) and/or staff must be able to account for why the acceptance of the gift was necessary; this must be recorded within the Register; and
- The officer(s)/staff must consider in their determination whether accepting such an offer may be misinterpreted and may lead to inaccurate expectations of favour, or service. If any doubt exists about the appropriateness of any gift or hospitality, or the motive of the person offering such, then it must be refused and

the offer recorded in the Register.

3.3 Gifts of cash, those comprising alcohol, or from contractors or companies tendering for work with the Commission, must never be accepted.

3.4 All offers of gifts, whether accepted or refused, must be reported to the Head of Governance and Board Secretary and will be entered into the Register.

## **4. Acceptance and Provision of Hospitality**

4.1 ICRIR officers and staff may receive hospitality in limited circumstances:

- Hospitality involved when officers/staff attend seminars, presentations and other functions in their professional capacity;
- In developing professional relationships with private/public organisations to gain support for, or further the development of the Commission's aims and objectives; or
- Light refreshments provided by individuals or by an outside organisation in the course of and incidental to a meeting or discussion of official business.

4.2 Staff must properly consider all the circumstances before accepting any hospitality. On all occasions, other than those under paragraph 4.1 (which makes reference to light refreshments), where an offer of hospitality is made, approval must be sought from the Head of Governance and Board Secretary before accepting. All requests for approval must be supported by an entry in the Register, whether or not approval is granted.

4.3 Examples of unacceptable hospitality are likely to include offers of accommodation (not related to official functions), sporting events, holidays, foreign trips or events of an inappropriate nature, such as invitations to gala dinners, or where the professional relationship between the host and the Commission may be brought into question (e.g. in the course of a competitive tendering process).

4.4 Where hospitality is offered by an established supplier, or potential supplier of goods or services, prior approval must be given by the Chief Operating Officer, in consultation with the Head of Governance and Board Secretary, to ensure no potential conflict or perceived conflict of interest exists.

4.5 ICRIR staff may provide limited hospitality to stakeholders, visitors and guests on ICRIR premises or at official events hosted by the Commission. Where the hospitality to be offered amounts to more than light refreshments, prior approval should be sought from the Head of Governance and Board Secretary. An entry must be made in the Register for all hospitality requiring prior approval.

4.6 Budget holders may authorise reasonable expenditure on providing hospitality within these guidelines.

## **5. Discounts and Concessions**

- 5.1 It is accepted that large commercial organisations may offer discounted rates for public sector services, including the Commission. Discounts and concessions offered to ICRIR staff, as part of the overall pay and benefits package, are not within the scope of this policy.

## **6. Further information**

- 6.1 If you have any questions about this policy, please contact the Head of Governance and Board Secretary.