

## **GIFTS AND HOSPITALITY POLICY - VOLUNTEERS**

The Institution of Engineering and Technology Savoy Place London WC2R 0BL

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#### 1 Why we have this Policy

- 1.1 The IET runs its activities with integrity. All of us must work together to ensure that the IET remains untainted by bribery or corruption, or allegations of it. This Policy helps us to achieve that aim and we are all, the Board of Trustees and volunteers, bound by it. Our colleagues in the IET's staff are bound by a similar policy.
- 1.2 The IET's reputation is a key asset. Any allegation of improper conduct can damage our reputation, making it difficult for us to engage effectively with our members, government departments, educational institutions and corporate partners. Therefore it is vital that our business practices are ethical and transparent.
- 1.3 We have issued this Policy to help us demonstrate that transparency and high level of ethical standards. The Policy covers the offer **or** receipt of gifts and hospitality, what can be accepted and offered and how to record these in order to demonstrate that they do not improperly influence things like our procurement of services. We have put together a form for declaring offers or receipts of gifts or hospitality, and we will maintain a register.
- 1.4 The IET recognises that corporate hospitality and occasional gifts are a feature of modern business life and are important in building effective relationships. This Policy does not seek to prevent or impede that, but to put in place parameters to ensure that such activities are proportionate and justifiable and handled transparently.

#### 2 Who this Policy applies to

2.1 This Policy applies to all volunteers.

#### 3 Other documents you need to read in relation to this Policy

- 3.1 You should also read the IET's:
  - 3.1.1 Anti-Bribery and Corruption Policy for volunteers;
  - 3.1.2 if you are involved in our governance, our Conflicts of Interest Policy; and
  - 3.1.3 Expenses Policy.

#### 4 Overview of this Policy

- 4.1 There is a lower limit of for gifts of £50 and for hospitality of £100, below which you will not need to make a declaration.
- 4.2 For gifts or hospitality above those limits, you will need to complete a Declaration of Gifts and Hospitality Form, and send it to the Head of Governance.
- 4.3 Gifts or hospitality above a value of £250 must not be accepted without the prior permission of the Honorary Treasurer (and the Honorary Treasurer must not accept any gifts or hospitality above those amounts without the permission of the President).
- 4.4 The Head of Governance will maintain a Register of Gifts and Hospitality as an Excel spreadsheet, which will record:
  - 4.4.1 the recipient of the gift/hospitality;
  - 4.4.2 the donor of the gift/hospitality; and
  - 4.4.3 the value of the gift/hospitality.
- 4.5 The Register of Gifts and Hospitality will be reviewed regularly.
- 4.6 The Register of Gifts and Hospitality will be available for inspection on request by the Honorary Treasurer, the Audit Committee, the IET's auditors, internal audit, the Director of Governance and External Engagement, and the IET's General Counsel.

#### 5 The Policy itself

- 5.1 The IET forbids any IET volunteer to solicit any gift or hospitality in the course of acting on the IET's behalf. This policy has no impact on that position.
- 5.2 For gifts above the value of £50 and hospitality above the value of £100, you should complete a Declaration of Gifts and Hospitality Form, and return it to the Head of Governance. For gifts or hospitality below that value, you will not need to make a declaration.
- 5.3 Gifts or hospitality above a value of £250 must not be accepted without the prior permission of the Honorary Treasurer (and the Honorary Treasurer must not accept any gifts or hospitality above those amounts without the permission of the President). Where permission is granted, you should complete a Declaration of Gifts and Hospitality Form, and return it, together with the permission, to the Head of Governance.
- 5.4 The Register held will be reviewed as follows:
- 5.4.1 in respect of UK-based volunteers, quarterly by the Director of Governance and External Engagement;
- 5.4.2 in respect of volunteers based outside the UK, quarterly by the Director of International, Strategic Marketing, and Engagement; and
- 5.4.3 in respect of all volunteers, annually by the Honorary Treasurer.
- 5.5 A report on the Register of Gifts and Hospitality will be made annually to the Audit and Risk Process Committee.
- 5.6 The Register of Gifts and Hospitality will be available for inspection on request by the Honorary Treasurer, the Audit Committee, the IET's auditors, the IET's internal auditor, the Director of Governance and External Engagement and the IET's General Counsel.
- 5.7 IET volunteers must not offer or receive any gift or hospitality which is in breach of any relevant law.
- 5.8 IET volunteers must not, whether directly or indirectly, make an offer of, or make a donation to any political, charitable or not-for-profit organisation in the course of acting for the IET as a way to obtain an advantage in any IET activity.
- 5.9 If you receive or offer gifts or hospitality in connection with your role as a volunteer, you should, complete a Gifts and Hospitality Declaration before accepting or giving the relevant gift or hospitality, or if this is not possible, not more than 2 weeks afterwards. Completed declarations should be sent to the Head of Governance, who will keep them in the Register of Gifts and Hospitality.
- 5.10 We all have a responsibility to speak out if corruption is suspected or you are aware of any gift or hospitality given or received which may be in breach of this policy. Such concerns may be in respect of:
  - 5.10.1 another volunteer;
  - 5.10.2 a member of our staff;
  - 5.10.3 a third party who represents us;
  - 5.10.4 by one of our suppliers, competitors or partners; or
  - 5.10.5 by anyone else perhaps even a customer seeking to get better terms from us;

and must be reported to the Head of Governance as soon as possible. If for any reason you cannot do this, please report it to our Internal Auditor. This can be done anonymously by letter if you prefer.

- 5.11 The IET will investigate all allegations of any breach of this policy, or any allegations of suspected corruption immediately.
- 5.12 Remember: even lower value gifts and hospitality are inappropriate if they are repeated or are intended to (or may appear to) improperly influence the recipient.

#### 6 Refusing a gift or hospitality

- 6.1 Where a gift or hospitality prohibited by this policy is offered to or received by a volunteer it should be refused.
- 6.2 The IET recognises that in certain situations it can be considered impolite to refuse a gift or hospitality. It is therefore important that gifts/hospitality are refused in a manner sensitive to all the circumstances so as to avoid causing any offence, eg by:
  - 6.2.1 thanking the giver for their thoughtfulness, taking care not to embarrass them, and
  - 6.2.2 expressing your apologies for not accepting the gift/hospitality and explaining why, mentioning this policy and specific rules as necessary
- 6.3 If a gift has already been received and the giver refuses to take it back, the gift should be sent to the Director of Governance and External Engagement, who will donate it to charity or include it in a Christmas draw/raffle for the IET's staff.
- 6.4 All gifts and hospitality offered or received but refused should be recorded in the [*Gifts and hospitality register*].

#### 7 What happens if you do not follow this Policy

- 7.1 If people allow factors such as gifts or hospitality to influence their decision making, they may take decisions which are not in the IET's best interests. This could be costly to the person concerned, and damage the work and reputation of the IET. Sometimes, even the perception that a decision has been influenced by a gift or hospitality is enough to cause reputational damage.
- 7.2 Volunteers who do not follow this Policy may find their conduct questioned and could ultimately be subject to action under the IET's Disciplinary Regulations.

#### 8 Queries and comments

8.1 If you have any queries regarding how this Policy works in practice, or comments or suggestions as to how it could be improved, please contact the IET's Head of Governance.

## APPENDIX 1 DECLARATION OF GIFTS AND HOSPITALITY FORM



#### DECLARATION OF GIFTS AND HOSPITALITY

I, ..... as a volunteer for The Institution of Engineering and Technology ("IET") declare the following gift/hospitality\* [\**delete as appropriate*].

Donor:	
Recipient:	
Description of gift/hospitality:	
Value of gift/hospitality:	

To the best of my knowledge and belief, the above information is complete and correct. I give my consent for the information to be used for the purposes described in the IET's Gifts and Hospitality Policy and for no other purpose.

Signed:	
Position:	
Date:	

# **IET Policy: Gifts and Hospitality**

## **Category of Policy: Volunteer**

Effective Date	Approved by	Author
October 2016	Alison Carr	Dom Pickersgill, Legal Counsel
Date of last review	Reviewed by	Date of next review
N/A		August 2017
December 2018	Dom Pickersgill	December 2019
June 2020	Dom Pickersgill	October 2021

Distribution	All volunteers via the Volunteer Hub (area of the IET web site)	
	and the volunteer e-learning portal.	

Change history						
Version	Author	Date	Summary of changes			
1.0	Dom Pickersgill	October 2016	First version.			
1.1	Dom Pickersgill	December 2018	References to Director of G&P changed to Director of G&EE			
1.2	Dom Pickersgill	June 2020	Paragraph 5.12 added, and section 6			