

Healthwatch North Tyneside policies and procedures

Gifts, Hospitality and Bribery policy

June 2024

1. Introduction

Healthwatch North Tyneside (HWNT) is committed to implementing and enforcing effective systems to counter bribery. Therefore, it is HWNT's policy to conduct all aspects of its business in an honest and ethical manner at all times. This policy applies to all individuals working for HWNT, including anyone providing services to the charity such as trustees, volunteers, consultants, or contractors.

2. Policy aim

The aim of this policy is to help HWNT act in accordance with the Bribery Act 2010, maintain the highest possible standards of business practice, and deliver its Financial Controls and Internal Controls Policy (please see for more information).

3. The law

Under UK law (UK Bribery Act 2010), bribery and corruption is punishable for individuals by up to ten years imprisonment. If HWNT is found to have taken part in the corruption or lacks adequate procedures to prevent bribery, it could face an unlimited fine and lose its status as a registered charity.

4. Policy statement

This policy applies to all permanent and fixed-term staff employed by HWNT, and any contractors, consultants, trustees, volunteers or other persons acting under or on behalf of HWNT. Further details can be found in our Financial Controls and Internal Controls Policy.

HWNT will not:

- Make contributions of any kind with the purpose of gaining any commercial advantage.
- Provide gifts or hospitality with the intention of persuading anyone to act improperly, or to influence a public official in the performance of their duties.
- Receive or make payments in return for a business favour or advantage.

HWNT will:

- Keep appropriate internal records that will evidence the business reason for making any payments to third parties.
- Encourage trustees, staff and volunteers to raise concerns about any issue or suspicion of malpractice at the earliest possible stage.
- See that anyone raising a concern about bribery will not suffer any detriment as a result, even if they turn out to be mistaken.

Representatives should at all times:

- behave honestly, be trustworthy and set a good example;
- not offer or accept bribes;
- use the resources of HWNT in the best interests of HWNT and not misuse those resources;
- make a clear distinction between the interests of HWNT and private interests to avoid any conflict of interest, and if such conflict does arise, report it to the Director or Chair of Trustees immediately where it should be recorded on the register of interests and declaration form;
- ensure that any community support, sponsorship or charitable donation does not constitute bribery and, if in doubt, consult the Director or Chair of Trustees;
- With confidentiality, report all incidents, risks and issues which are contrary to this policy document to the Director or Chair of Trustees (see also the Whistleblowing Policy and Procedure);
- raise any issues regarding bribery laws and the organisation's policies. Queries will be dealt with anonymously and a written response will be issued, where possible, within 20 working days.

5. Staff and volunteer responsibility

Staff and volunteers must not:

- Accept any financial or other reward from any person in return for providing some favour.
- Request a financial or other reward from any person in return for providing some favour.
- Offer any financial or other reward to any person in return for providing some favour.

6. Gifts and hospitality

This policy does not prohibit giving and receiving promotional gifts of low value, or normal and appropriate hospitality.

Receiving business gifts:

Receiving promotional gifts of low value is normal and appropriate; however, gifts with a value exceeding £15 may not be accepted without approval. Where gifts are offered that are of a value of over £15 then the recipient must refer to the Conflicts of Interest Policy and bring it to the attention of the Director or Chair of Trustees. In such circumstances, the recipient must advise how the gift has been used, and record details of the gift in the HWNT Register of Interests and Gifts.

If anyone representing HWNT is at any time uncertain as to whether their actions will comply with this policy, they must seek guidance from the Director or Chair of Trustees.

Any gift offered and then refused because of its value, must be reported to the Director or Chair of Trustees and recorded.

Offering business gifts:

Business gifts are primarily aimed at thanking donors and suppliers for their custom and loyalty, only authorised gifts may be given.

Receiving hospitality:

The acceptance of corporate hospitality must be transparent; all invitations must be reported to the Director or Chair of Trustees before an employee accepts any invitation. The following areas are exempt while attending conferences, seminars, sponsored by third parties.

- Business and travel expenses incurred

- Normal business lunches and meals

Offering gifts and hospitality:

HWNT hospitality is primarily aimed at thanking volunteers, donors and suppliers for their custom and loyalty. All hospitality events must have approval from the Director or Chair.

Donations to organisations:

Donations should be made to other charities or other organisations in line with the authorising expenditure limits set out in the Financial Conduct and Internal Control Policy.

No donations to political parties should be made by Healthwatch North Tyneside as we are a politically neutral organisation.

7. Non compliance

Staff failing to observe HWNT policy may lead to disciplinary action in accordance with HWNT's Disciplinary Policy.

Volunteers and trustees failing to observe HWNT policy may lead to disciplinary action in accordance with the relevant volunteer and trustee handbooks.

In the event of a breach of the policy by other organisations, or individuals, HWNT will take appropriate action.

8. Monitoring policy

The policy will be monitored on an on-going basis to ensure that it addresses issues effectively.

The following will be monitored:

- That all individuals working for HWNT are advised of the policy.
- Assessment of any reported incident or related occurrence.

Monitoring of the policy is essential to assess how effective HWNT has been to establish control of its obligations.

9. Definitions

Bribe is a financial or other advantage offered or given to anyone to persuade them to, or reward them for, performing their duties improperly, or, with the intention of influencing them in the performance of their duties.

Hospitality covers both being hospitable, including the reception and entertainment of guests or visitors, or receiving such hospitality.

10. Reviewing Policy

This policy will be reviewed every three years, and, if necessary, revised in the light of legislative or organisational changes.

Document classification	Internal	Document reference	
Document category	Governance	Policy introduced	October 2014
Reviewed by	Paul Jones	Date last updated	Jan 2024
Approved by	Board	Date approved	June 2024
		Review date	June 2027