

Gifts and Hospitality Declaration Policy

This policy applies to the trustees, Chair of Audit Committee, CEO and Directors of IOM3, hereinafter referred to as key decision makers.

IOM3 policy statement on gifts and hospitality

From time to time, given their role within IOM3, key decision makers might be offered gifts, hospitality or some other benefit by those outside IOM3. There may also be times when key decision makers believe it may be appropriate to provide a gift or hospitality outside of IOM3. This policy outlines how key decision makers should deal with receipt or provision of such gifts or hospitality.

- 1. Key decision makers have a duty to make sure the charitable funds of IOM3 are spent for the purpose for which they were intended. This means that any consideration of providing gifts or hospitality arising from their roles should be treated with caution.
- 2. Key decision makers should never expect or generally accept gifts or hospitality as a reward for either doing or not doing something, or for showing advantage to someone or some other organisation. For example, key decision makers should not accept excessive gifts (eg a case of wine) in return for giving a talk about IOM3, or for choosing to use that particular supplier.
- 3. One-off gifts of a trivial nature or minor seasonal items (eg box of chocolates at Christmas) may be accepted and do not require declaration if their value is below £50. Multiple gifts and hospitality provided by the same person or organisation and totalling over £50 per calendar year should be declared.
- 4. Key decision makers should not offer gifts or hospitality to others seeking to work with IOM3 (eg free attendance at IOM3 events or gifts bought with IOM3 funds in return for supplier's favourable rates).
- 5. Conventional hospitality may be accepted where it is normal and reasonable in the circumstances. For example, when speaking at an event key decision makers may accept overnight accommodation paid for by the organiser but the value of this should be reasonable in the circumstances.
- 6. Conventional hospitality may be offered to others where it is normal and reasonable in the circumstances. For example, a trustee may offer to pay for lunch when meeting with an IOM3 stakeholder to discuss work of IOM3.
- 7. One-off gifts of a trivial nature may be offered to others where it is normal and reasonable. For example, a box of chocolates, bouquet of flowers or bottle of wine may be given to speaker at an event.
- 8. Before accepting or offering any gifts or hospitality, key decision makers should consider whether doing so is in the best interests of IOM3 and proportionate to that interest. When considering this, key decision makers should 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 in doubt, key decision makers should speak to the Executive Board Chair or IOM3 CEO before accepting or offering gifts or hospitality.
- 9. Where key decision makers use their own funds to pay for an appropriate gift or hospitality, they may claim back the money spent through the normal expenses process.
- 10. All gifts or hospitality accepted or offered by key decision makers, which exceed a notional value of £50, should be reported to IOM3 Head of Governance, who will maintain IOM3 Register of Gifts and Hospitality. The register will open to member inspection on request and total value of gifts and hospitality received and offered may be declared in IOM3 Annual Report and Accounts.
- 11. If key decision makers are in doubt of the likely value of gifts or hospitality, they should provide details to Head of Governance who will estimate value of the gift or hospitality based on the current market rates.
- 12. Gifts of cash to key decision makers should always be refused and never offered to others.
- 13. Should a monetary donation be proposed to IOM3, IOM3 Education & Outreach Trust or Members' Benevolent Trust by a current or potential supplier or contractor, the offer should be referred to the Executive Board Chair, IOM3 CEO and/or IOM3 Finance Director, who will need to be satisfied that nothing improper or suspicious would be seen by receiving the donation, bearing in mind that as charities, there must be a good reason to refuse any donation.
- 14. If a monetary donation is accepted, the donor should notify IOM3 in writing of the value of the donation, the funds should be transferred directly to IOM3, IOM3 Education & Outreach Trust or Members' Benevolent Trust and a receipt issued by IOM3 finance team.

Approval

Date Adopted	23 May 2025
Adopted by	Executive Board
Last Review Date	
Reviewed By	
Next Review Date	30 June 2028