ICO Gifts and Hospitality policy
1. **Scope**

1.1 This policy applies to all employees of the Information Commissioner's Office.

2. **Introduction**

2.1 This policy tells you what to do if you are offered gifts and hospitality.

2.2 The ICO Code of Conduct for Staff states that:

You should not use your official position to receive, agree to accept or attempt to obtain any payment or other consideration for doing, or not doing, anything or showing favour, or disfavour, to any person.

You should not receive benefits of any kind from a third party which might reasonably be seen to compromise your personal judgement and integrity.

2.3 Similar policies can be found across the public sector and protect staff from accusations of showing favour to, for example, a data controller against which we are considering formal enforcement action.

3. **Gifts**

3.1 Gifts are categorised into three broad groups:

A. **Do not accept**: Gifts which might look to people outside the organisation as if they have been offered to compromise personal judgement and integrity should not be accepted. These will generally be high value items. In addition any gift or hospitality from an organisation against which you know we are considering formal enforcement action should not be accepted.

B. **Can be accepted but will normally be raffled or shared**: Some gifts and hospitality can be accepted. These will generally be lower value items of under approximately £20; eg a bottle of wine and items which might be difficult to refuse; for example gifts from an international delegation.

C. **Can be accepted and kept by the individual** There are also smaller gifts, for example those often handed out at conferences, such as pens and diaries, which usually cost less than £5 and are essentially marketing tools. These are acceptable, can be kept by the individual and do not need to be recorded in the register.
3.2 Gifts which can be accepted (category B) will normally be made available to staff via a raffle. Raffle tickets are sold to staff and money raised goes to charity. However, if the gift is perishable or otherwise not suitable for storage and raffling, it can be consumed by teams and departments at the discretion of managers. And flowers may be kept by the individual. These gifts do need to be recorded in the register.

4 **Hospitality**

4.1 Hospitality in the form of reasonable refreshments, working lunches etc can be accepted and do not need to be recorded in the register. However you may need to note receiving refreshments when making expense claims.

4.2 Hospitality which goes further, for example formal dinners at conferences, or drink receptions organised by a stakeholder, can be accepted but need to be included in the register.

5 **Travel and other costs associated with attending a conference as a speaker**

5.1 It is ICO policy to ask for the travel and subsistence costs of an ICO speaker to be paid by commercial conference organisers. Receipts can be kept by the ICO.

5.2 You should not ask for or accept such payments if you know we are considering any formal enforcement action against either the body organising the event or the organisation on behalf of which the event is being organised. In such cases it will be worth considering whether the ICO should attend the event at all.

6 **How to decide what to do**

6.1 Decisions on which category an offer of a gift or hospitality falls under will depend on the value of the gift or hospitality, the provider, and the circumstances around the offer.

6.2 If offered a gift or hospitality in the first instance read the annex to this policy and discuss it with your manager. If it is still not clear please discuss with the Head of Finance, Head of Organisational Development or the Senior Corporate Governance Manager.

6.3 Any gift or hospitality from any organisation against which you know we are considering formal enforcement action should not be accepted. And if you accept a gift or hospitality and subsequently find out that formal enforcement action is being considered a gift can always be returned depending on the exact circumstances.

6.4 If in doubt do not accept the gift or hospitality.
## Gifts and hospitality register

7.1 The Gifts and Hospitality register is kept by the Facilities Team in Wycliffe House.

7.2 If you receive a gift or hospitality which has to be recorded you will need to go to Facilities and they will be able to help. They will make the register available and will store gifts which need to be kept. In addition the team is responsible for providing an electronic list of the gifts and hospitality received each quarter to Corporate Communications to place on the website.

7.3 If you forget to register a gift please do so as soon as possible. Better a late entry than not at all.

## Regional offices

8.1 Regional offices should maintain their own registers and each quarter send an electronic version to Facilities for publication on the website.

8.2 Decisions on what to do with gifts received are for the relevant Assistant Commissioner, bearing in mind this policy. Gifts could be raffled to staff or donated to local charities.

## Reward schemes

9.1 The policy in respect of reward schemes such as Air Miles is that when obtained via work purchases (eg travel tickets) they should be used for work purposes if at all possible. This is only likely to occur when purchasing travel as an individual with the intention of claiming the cost back from the ICO.
### Categorisation of gifts and hospitality

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<tr>
<th>Category</th>
<th>Examples</th>
<th>What you should do</th>
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| A. Do not accept. | - Financial gifts (money/gift-vouchers /discounts etc)  
- Expensive food hamper  
- Membership of or subscription to clubs  
- Tickets to sporting or social events  
- Expensive items of clothing  
- Holidays | These **cannot** be accepted, or, if difficult to refuse at the time, should be returned as soon as possible. |
| | Generally high value gifts and hospitality which might look as if it has been offered to compromise personal judgement and integrity.  
Anything offered by an organisation against which you know we are considering any form of action against. | | |
| B. Can be accepted but will normally be raffled or shared. | - An evening meal  
- Bottle of wine  
- Flowers  
- Books  
- CDs | These can be accepted.  
Their receipt **does** need to be noted in the gifts and hospitality register and if appropriate they should go into the staff raffle.  
If the gift has a finite life (eg flowers, food etc) it can be retained by the individual or shared amongst colleagues depending on what is given. |
| | Generally lower value under (£20) items such as a bottle of wine, or which might be difficult to refuse; eg if given by an international delegation. | | |
| C. Can be accepted and kept by the individual. | - Working lunches and other low value refreshments  
- Pens  
- Key-rings  
- Mugs  
- Note pads  
- Diaries | These can be accepted.  
Their receipt **does not** need to be included in the gifts and hospitality register. |
| | Very low value items (a few £ at most) such as marketing gifts given out at conferences or pens and note-pads given out on training courses | | |