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## GIFT POLICY

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## FOREWORD



The Wildlife Research and Training Institute has set high fundraising goals to meet its strategic plans as a global centre of excellence, consistently producing and delivering relevant scientific evidence for policy and action on wildlife and related issues.

We acknowledge and value the role that donors and gifts play in helping us achieve these goals and in supporting our mission and priorities. The gift policy lays out the fundamental principles and guidelines that govern the Institute's relationship with its funders and the foundation for accepting gifts.

It facilitates legal compliance, risk mitigation, donor relations management, and operational efficiency.



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A handwritten signature in blue ink, which appears to read "Dr. David Nkedianye". The signature is written over a horizontal dotted line.

**DR DAVID NKEDIANYE**  
**CHAIR, BOARD OF THE INSTITUTE**

**DATE:** 16<sup>th</sup> May, 2025

## PREFACE



Our goal at the Institute is to foster integrity and trust by acting in the best interests of the Board and being open, truthful, and transparent both internally and externally.

The Institute is open to donations that support its main programs and special initiatives while also aligning with its mission and goals.

It is generally accepted that individuals, partners, corporations, foundations, government agencies, and others will provide donations and other forms of support. What the gift will mean for the Institute will be the main factor.

### **The Institute will not accept presents that:**

- (a) would cause it to transgress its mandate;
- (b) would cause the Institute to lose its standing;
- (c) would have unacceptably negative effects on the Institute;
- (d) are too costly or difficult to administer in comparison to their worth; or
- (e) are for objectives unrelated to the Institute's goals and principles.

.....  
**DR. PATRICK OMONDI, OGW**  
**DIRECTOR/CEO**

**DATE:** 16<sup>th</sup> May, 2025

## DEFINITIONS

**Board:** means Board of the Institute

**Gift:** means a gift or means anything that confers a benefit to the recipient

**Maximum value:** means maximum value that a non monetary gift to a public officer may have without being deemed to be gift to the Institute is 20,000 shillings

**Reportable gift:** means gifts irrespective of the monetary value.



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## REFERENCES

- (i) Constitution of Constitution
- (ii) Leadership and Integrity Act (Cap 185C)
- (iii) Public Officer Ethics Act (Cap 185B)
- (iv) Public Procurement and Asset Disposal Act(Cap 412C).
- (v) Wildlife Research and Training Institute, Code of Conduct and Ethics



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## **1.0 OVERVIEW**

The Wildlife Research and Training Institute acknowledges that giving and receiving gifts from business associates is commonplace and accepted. Gift-giving and receiving are common social interactions. This type of exchange is neither unusual nor irregular.

Nonetheless, it is acknowledged that a clear policy is required to establish limits on the value of these gifts and to specify the conditions that would make keeping gifts acceptable or unacceptable. Giving or receiving gifts in order to obtain favours or preferential treatment, or to improperly influence or induce others in exchange for favours or preferential treatment, is the fundamental principle.

It is crucial that all staff members, clients, vendors, contractors, and consultants at the Wildlife Research and Training Institute fulfil their duties in an unbiased manner. Establishing guidelines that will help all Wildlife Research and Training Institute staff, clients, vendors, contractors, and consultants decide when to accept or reject a gift or benefit in line with our dedication to the Board's values of integrity and trust is the aim of this policy.

## **2.0 SCOPE**

This policy will apply to all employees of Wildlife Research and Training Institute, customers, suppliers, contractors and consultants.

## **3.0 CIRCUMSTANCES UNDER WHICH GIFTS CAN BE ACCEPTABLE OR UNACCEPTABLE**

The Institute's employees, clients, suppliers, contractors, and/or consultants are generally prohibited from asking for or accepting gifts, including non-cash gifts like gratuities, hospitality, free passes, services, or favours, among other things.

### **3.1 Acceptable gifts**

A non-cash gift may be accepted in the recipient's official capacity without restricting the scope of paragraph 7.1 if:

#### **The present must:**

- (a) fall within the typical parameters of propriety, be a customary gesture of courtesy or protocol, and adhere to the customary standards of hospitality;
- (b) not be monetary; and
- (c) not exceed twenty thousand shillings.

Irrespective of the gift's monetary value, the person accepting it on behalf of the Institute must report it to the Institute using the form A.

**The Institute will take the following things into account when deciding whether to accept gifts:**

- (a) Values: whether accepting the gift jeopardises any of the Institute's fundamental principles.
- (b) Compatibility: whether the donor's intentions and the Institute's use of the gift are compatible.
- (c) Public relations: could accepting the gift harm the Institute's reputation.
- (d) Consistency: Does accepting the gift align with past customs.
- (e) Gift Type—Is the gift provided in a way that the Institute can utilise without experiencing significant costs or challenges.

In cases where the gift exceeds twenty thousand shillings, the recipient must turn it in to the Institute via the appropriate department head within 48 hours of reporting to work.

The CEO is responsible for deciding whether to accept or reject a gift and determining whether it is restrictive.

The Board of Directors must give its approval before gifts of securities, real estate, or personal property can be accepted.

The CEO will decide how to dispose of the gift with reference to the Public Procurement and Asset Disposal Act (Cap 412C) if the recipient is unaware that the gift was given, or if refusing a gift or donation would be disrespectful to custom or could result in poor public relations.

### **3.2 Unacceptable Gifts**

Regardless of the size of the gift or entertainment, the Institute forbids giving, receiving, or taking part in any gift that is meant to produce an outcome that would not have been possible without the gift or any improper or unauthorised inducement to do or not do anything.

If a gift is intended to undermine the recipient's objectivity, impartiality, or integrity, or to raise a possible conflict of interest, it cannot be accepted;

A gift cannot be accepted from a person or organisation that is in any way in arrears with the Institute. Parties in default, for example, are those from whom money is past due, those with whom the business is facing legal action, or those who have been disciplined.



Jewellery or other presents made of precious metal, stones, ivory, or any other animal parts protected by the Convention on International Trade in Endangered Species of Wild Fauna and Flora; or 7.3.5 any other kind of gift that the Ethics and Anti-Corruption Commission has designated in the regulations.

It is advisable for the recipient to verify the parties' status from the CEO's office to make sure the aforementioned clause's terms are being followed.

#### **4.0 GIFT REGISTER**

*The Institute will maintain records of:*

- (a) gifts given by the Institute and
- (b) gifts received on its behalf.

The registers of gifts mentioned in paragraph 8.1 must be kept in the format indicated in Forms B-I and B-II, respectively.

#### **5.0 TRANSPORTATION, STORAGE AND DISPOSAL OF GIFTS**

The Institute is responsible for arranging for the transportation of gifts that are received but cannot be transported right away.

The Institute is responsible for keeping any gifts it receives in good condition until they are donated or used in another way.

#### **6.0 UTILIZATION OF GIFTS**

A gift given to an employee, supplier, contractor, or consultant because of their affiliation with the Institute will be considered Institute property and will be accepted, used, and finally disposed of in compliance with the Public Procurement and Asset Disposal Act.

If a gift is given to the Institute and it chooses to use it, it must be registered in the same way as any other item the Institute purchases.

The Institute's Fixed Asset Register must be updated with the gifts' details for fixed assets such as IT equipment (computers, laptops, printers, and servers), office equipment (photocopiers, scanners, and phones), furniture, property, plant, and equipment (PPE), land, and fleet (cars and vans).

## **7.0 ROLES AND RESPONSIBILITIES**

### **7.1 Director/CEO**

#### **The Director shall:**

Accept all reported reportable gifts. This policy, the Code of Conduct and Ethics, and the values of the Board of Institute will all be taken into consideration when evaluating reported gifts.

### **7.2 Employees, Customers, Suppliers, Contractors and Consultants**

Unless otherwise specified in paragraph 7.2.4, all employees, clients, suppliers, contractors, and/or consultants are required to notify the CEO in writing within ten days of receiving any gift or benefit offered to them in connection with their work or relationship with the Institute using the form provided.

Employees must notify the CEO via their department heads when they receive gifts.

### **7.3 Head of Departments**

#### **The Head of Departments shall:**

- (i) Verify that the Gift Register centrally records all authorised gifts and benefits.
- (ii) Report any gifts or benefits being given to themselves or their subordinates to the CEO via the Head of Human Resources and Administration.

### **7.4 Head Human Resource & Administration**

In addition to maintaining the Gifts Register, give the CEO quarterly reports and updates.

## **8.0 REPORTING OF GIFTS**

The Institute will submit a report to the Ethics and Anti-Corruption Commission at the end of each fiscal year that details—

- (a) all gifts received;
- (b) any gifts the Institute intends to dispose of; and
- (c) any gifts the Institute has disposed of.

Within thirty days following the end of the fiscal year, the report under paragraph 12.1 must be delivered to the Commission.

In the event that the Institute has not received, disposed of, or plans to dispose of any gifts, it must still make the report in line with paragraph 12.1.

## **9.0 CONTRAVENTION OF POLICY**

Employees who fail to fulfil their responsibilities under this policy will face disciplinary action from management in line with the Human Resources Policy and Procedure Manual and the Code of Conduct guidelines.

In accordance with the Institute's procurement manual and applicable procurement laws, suppliers, contractors, or consultants who violate this policy will be subject to penalties.

## **10.0 REVIEW**

This policy shall be reviewed every two (2) years.



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## 11.0 ANNEXURES

### Form A

Serial No. ....

### GIFT DECLARATION FORM

*( To be submitted in duplicate. Attach relevant information or documentation relating to the gift)*

#### **PART I**

Recipient's Name: .....

Recipient's designation: .....

National ID/Passport No.....

Recipient's Employer: .....

Name of the donor institution: .....

Name and title of the presenter: .....

Description of the gift: .....

Estimated value of the gift: .....

Current location of the gift: .....

Date of receipt/issuance of the gift: .....

Date of declaration of the gift: .....

Date the gift was surrendered where applicable: .....

Function at which the gift was received/ issued:

.....

Signature of declarant: .....

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.....

#### **PART II - Recommendation of the Processing officer**

**Retain/Surrender (strike as appropriate)** 13 .....

.....

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#### **Remarks of the Authorizing Officer**

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*Name and Designation of the Signature and Date*

*Authorized officer*

**Form B-I****REGISTER OF GIFTS RECEIVED**

Name of Entity: .....

Serial No.	Name of Officer Receiving Gift	ID/P P NO.	Name of Entity and Officer giving the gift	Description of Gift	Estimated market value of the gift	Date of receipt of the gift	Occasion or Function gift was issued	Date of Surrender	Any other Information

**Form B-II**  
**REGISTER OF GIFTS GIVEN**

Serial No.	Name of Officer Receiving Gift	ID/P P NO.	Name of Entity and Officer giving the gift	Description of Gift	Estimated market value of the gift	Date of receipt of the gift	Occasion or Function gift was issued	Date of Surrender	Any other Information