Gifts and Hospitality Policy

Purpose and Scope

The aim of the Gifts and Hospitality Policy is to guard against the risk of allegations of impropriety by members or staff, however contracted, by providing advice on the acceptance of gifts and hospitality. The policy applies to all staff working for the Council or on the Council's behalf. References to "staff" includes agency workers, secondees, and consultants.

Under the Bribery Act 2010, it is a criminal offence for employees in an official capacity to accept any gift or consideration as an inducement or reward for:

- doing or not doing anything
- showing favour or disfavour to any person

"Gift" includes but is not limited to any offer to staff of money, vouchers, tickets to sporting events or other entertainment, discounts for goods or services for personal use and any items for their personal benefit or use.

"Hospitality" includes but is not limited to any offers to staff of hospitality at promotional or marketing events, private events/meetings (including offers to breakfasts, lunches or dinners), and tickets to sporting events or other entertainment.

Section 117(2) of the Local Government Act 1972 also makes it a specific offence for an officer of a local authority *'under colour of his office or employment'* to accept any fee or reward whatsoever, other than their proper remuneration.

The acceptance of gifts or hospitality from members of the public, service users, contractors or service providers linked to the Council could be presented as promoting a conflict of interest that might arguably have compromised the impartiality of staff in the decisions that they were required to make.

As such staff must not accept any gifts or hospitality which might, or might reasonably appear to, compromise their personal judgement or integrity or place them under an improper obligation. Staff must never canvass or seek gifts and hospitality.

Gifts

You must not, either directly or indirectly, accept any gift, reward or benefit from any member of the public or organisation with whom you have been brought into contact by reason of your official duties. The only exceptions to this rule are gifts that:

- are offered at an appropriate time (e.g. not in advance of any decision about eligibility for the provision of a Council service or in advance of the award of a contract)
- is a one off and isolated item of a wholly trivial character with an estimated monetary value of under £25 (i.e a box of chocolates or bottle of wine of no more than £25 in value). Beyond those exceptions if you receive or are offered a gift, it should otherwise be declined or returned

All gifts (whether accepted or declined and regardless of value) must be reported by the employee concerned via MyView (under Employee forms, Declaration of Interests), within 14 calendar days.

Your Deputy Director (or line manager for staff employed at Deputy Director and above) will be notified via MyView and you will be advised if any further action is required.

Hospitality

You must seek approval in advance via MyView (under Employee forms, Declaration of Interests) before accepting any offer of hospitality and exercise the utmost discretion in accepting outside hospitality of any kind. Acceptance may raise concerns that your impartiality in dealing with official matters will be affected.

Invitations must not normally be accepted but, where it is clearly evident that the work of the Council may be facilitated, occasional invitations to attend receptions, modest working lunches or dinners and the like may be accepted if approved.

Approval must be obtained from your Deputy Director. Officers employed at Deputy Director level or above must seek approval from their line manager. Approved external training courses or conferences where the provision of hospitality (for example a working lunch) was part of the event do not require separate authorisation.

All offers of hospitality must be declared on MyView, including those that are declined, within 14 calendar days of the offer being made. In exceptional circumstances, where it is not possible to seek prior approval, you must inform your manager immediately afterwards and submit a retrospective request via MyView.

For the avoidance of doubt, offers of hospitality with no relevance to the Council's work (for example tickets to sporting events or concerts) should always be declined.

Monitoring and Review

The registration of gifts and hospitality on MyView will ensure a central register is maintained.

A quarterly report will be provided to the Head of Assurance for review and an annual report submitted to the Corporate Leadership Team.