



Gifts and Hospitality Policy

September 2021

Policy Aims

The aim of this policy is to ensure that GFirst Local Enterprise Partnership will not create an obligation on either party as a result of hospitality (or gifts), but that such occasions will be used to enhance our professional working relationships.

Recommendation 32 of the Nolan Committee requires that: "...a record of invitations and offers of hospitality should be kept. There should be clear rules specifying the circumstances in which staff should seek management advice about the advisability of accepting invitations and offers of hospitality".

Responsibilities

It is the responsibility of the Chief Executive to ensure that:

- Staff maintain the hospitality register
- The register can provide the basis for the provision of information to Partners
- Staff are fully aware of the duty upon them to record gifts and hospitality, and the procedures for doing so. It must be emphasised that the intent of this policy is not to discourage or prevent the acceptance of hospitality where this is helpful to further the interests of GFirst. The Nolan Committee accepted that there were advantages in officials continuing to be free to accept invitations to working lunches and dinners and for those with a representational role to attend other events.

Policy

The acceptance of any hospitality and/ or gifts must be consistent with:

- The provisions of the Prevention of Corruption Acts, which make it a criminal offence for staff in their official capacity, to accept any gift or consideration corruptly as an inducement or reward for doing (or not doing) anything or showing favour (or disfavour) to any person in their official capacity
- The general principle that staff should not receive benefits of any kind from a third party which might be seen to compromise their personal judgement or integrity.

The guiding principles are that:

- Staff's conduct in a private capacity must not give rise to any suspicion of conflict between their official duty and private interests
- Staff's conduct in an official capacity must not give the impression, to any member of the public, to any organisation with which they deal, or to colleagues, that they have been (or may have been) influenced by a gift or consideration to show favour or disfavour to any person or organisation
- Any gifts or hospitality should always be refused if the member of staff or the company is in any doubts about the propriety of accepting.

Acceptability Assessment Gifts, entertainment and hospitality include the receipt or offer of gifts, meals or tokens of appreciation and gratitude, or invitations to events, functions, or other social gatherings, in connection with matters related to the business.

These activities are acceptable provided they fall within reasonable bounds of value and occurrence.

In order to evaluate what is acceptable, the following process will be established:

- What is the intention – is it to build a relationship or is it something else?
- How would this look if these details were on the front page of a newspaper?
- What if the situation were to be reversed – would there be a double standard?

If it is difficult to answer one of the above questions, there may a risk involved which could potentially damage the LEP's reputation and business. The action could well be unlawful.

Circumstances which are never permissible include examples that involve:

- A 'quid pro quo' (offered for something in return)
- Gifts in the form of cash/or cash equivalent vouchers
- Gifts offered during the time of a major bid, tender or transaction

As a general rule, the LEP will not provide gifts to, or receive them from a government official. Report immediately to the Chief Executive any overt or covert offer of a gift or other inducement to some action pertaining to a contract.

Circumstances that are usually acceptable include:

- Modest/occasional meals with someone with whom the LEP does business
- Occasional attendance at ordinary sports, theatre and other cultural events

- Gifts of nominal value, such as pens, or small promotional items.

If an example does not fall under the above categories, it is necessary to seek guidance from a manager.

The Register

All gifts and hospitality accepted with a value of over £25 must be recorded in the Hospitality & Gifts Log, which is published on the LEP's website.

In addition to all gifts and hospitality received, an **Expenses Register** is maintained for all Board members that highlights any associated payments (e.g. for travel and subsistence). This is updated on a quarterly basis and again published on the GFirst LEP website.

Declaration of receipt of a gift, hospitality or favour

1.1.2020 - 31.03.2022

Name	Details of Event or Gift	Date	Provider/Supplier	Relationship to provider/supplier	Nature of hospitality	Location/ Event	attendance ie spouse/partner	Estimated value
CEO	Dinner	3/02/2020	Management Research Group	Presentation	Dinner	Greenway Hotel, Cheltenham	No	£40
CEO	Cheltenham Races	13/03/2020	The Jockey Club	Networking event	Races/Lunch	Cheltenham Racecourse	Yes	£100
Programme Manager	Christmas Gift	24/12/2020	KJ Bell Group Ltd	Project partner	Wine	N/A	No	£120
Projects & Infrastructure Manager	Christmas Gift	24/12/2020	KJ Bell Group Ltd	Project partner	Wine	N/A	No	£120
Deputy CEO	Christmas Gift	17/12/2021	Bex Media	Project partner	Hamper	N/A	No	£50
Marketing Manager	Christmas Gift	17/12/2021	Bex Media	Project partner	Hamper	N/A	No	£50
Projects & Infrastructure Manager	Christmas Gift	17/01/2022	KJ Bell Group Ltd	Project partner	Wine	N/A	No	£50
CEO	Cheltenham Races	16/03/2022	The Jockey Club	Networking event	Races/Lunch	Cheltenham Racecourse	No	£100
Expenses Register								
Dr Diane Savory (Chair)	Reimbursement for conference call charges on personal landline/mobile phone	31/03/2021	GFirst LEP	Chair	n/a	n/a	n/a	£150