GIFTS AND HOSPITALITY POLICY

AMENDMENT HISTORY

Date	New Issue No.	Details of Amendment
Feb 2021	1	Draft Policy for Staff Consultation
June 2021	2	Final Policy Document
July 2026	3	Acting CEX changed to CEX

1. INTRODUCTION

1.1 This policy applies to all arc21 staff and should be used in conjunction with the Anti-Bribery policy.

2. GENERAL PRINCIPLES

2.1 As with all public expenditure, hospitality expenditure should be value for money and incurred in accordance with the principles of regularity and propriety.

Consideration should be given to the central importance of propriety and correctness in line with the Nolan principles, as set out in the Code of Conduct for Local Government Employees.

2.2 The fundamental principle is that no member of staff should do anything which might give rise to the impression that he or she has been or might be influenced by a gift or hospitality or other consideration to show bias for or against any person or organisation while carrying out official duties.

2.3 The organisation maintains a Register of Gifts and Hospitality which will be available for review. The purpose of the register will be to counter any possible accusations or suspicions of breach of rules of conduct by employees. The register is subject to Freedom of Information (FOI) requests and employees should bear this in mind when deciding on the acceptance of any gifts or hospitality.

3. ACCEPTANCE OF GIFTS

3.1 The general principle is that all gifts offered should be refused. However seasonal, gifts with a value up to £50, may be accepted by individuals without the need for these to be approved in advance but must be recorded in the register whether accepted or declined.

3.2 More expensive or substantial items, valued at more than £50 cannot on any account be accepted and must be returned to the sender and also recorded in the register.

3.3 Trade, loyalty or discount cards by which a staff member might <u>personally</u> benefit from the purchase of goods or services at a reduced price are classified as gifts and should be refused or returned to sender.

3.4 Frequent flyer cards used by airlines cannot in relation to business travel be used by staff to avail of special departure lounges and priority booking and check-in. They must NOT make private use of any flights/air miles, which derive from flights paid for from the public purse.

4. STAFF INVOLVED IN THE PROCUREMENT OR MONITORING OF A CONTRACT

4.1 Apart from gifts up to a value of £50, no gifts **OF ANY KIND** from any source should be accepted by anyone involved in the monitoring of a contract, without the prior written approval of a Director/Chief Executive. This will ensure that no criticism can be made regarding bias to a particular company or supplier. No gift or hospitality of any kind from any source should be accepted by anyone involved in the procurement phase of any contract (see 6.5 below).

5. GIFTS RECEIVED IN RECOGNITION OF WORK DONE

5.1 On no account should a gift or gratuity be solicited or requested unless written approval is sought in advance. Where gifts by way of gratuities or vouchers etc. for lectures, broadcasts or similar occurrences are offered, then acceptance should be based on how much of the preparatory work for the event was done in the staff members own time, how much in official time and the extent to which the organisation resources were used in the preparation.

5.2 The following guidelines should be applied:

- If the preparation was carried out entirely in the staff members own time and the event took place outside normal working hours at no expense to the organisation, it would be acceptable for the individual staff member to retain the whole fee, token or other gift;

- If, however, the preparation was done wholly in the organisation’s time with the use of arc21 resources, no gifts or fee should be accepted unless the event is carried out outside of normal working hours when a gift or token to the value of up to £50 is acceptable;

- If the preparation was carried out and the lecture etc., delivered in the staff members own time but organisation facilities were used for typing, preparation of PowerPoint / overheads etc., then a gift or token to the value of not more than £50 is acceptable; and

- All invitations received in respect of Entertainment or Hospitality, whether accepted or declined, must be recorded using the Register of Gifts and Hospitality form and approved by a Director/Chief Executive.

6. HOSPITALITY

6.1 The handling of offers of hospitality is recognised as being much more difficult to regulate but it is an area in which employees must exercise careful judgement. In exercising this judgement, it is acknowledged that there can be difficulty in distinguishing between a "gift" and "hospitality". It is also recognised that it can be as embarrassing to refuse hospitality, as it can be to refuse a gift.

6.2 The acceptance of what would be accepted as conventional hospitality, for example working lunches and evening dining, should, in the main, cause no problem especially if its acceptance is in the interests of the organisation.

6.3 Hospitality, which would not be acceptable, would include invitations to frequent or more expensive social functions where there is no direct link to official business (sporting events, the theatre, opera or ballet etc.), particularly where these come from the same source, and those which involve travel, hotel or other subsistence expenses.

6.4 It can be argued that if employees are to achieve the best value for money in dealings with suppliers or consultants then they need to build up contacts and that it is quite legitimate for them to have a close working relationship with organisations or individuals, which may involve a degree of hospitality.

6.5 There may also be instances where employees receive invitations to events run by organisations such as Conferences or Business Dinners. Attendance at such events is considered an integral element in building and maintaining relationships with these sectors and any hospitality received is likely to be reasonable and proportionate, and therefore acceptable.

6.6 Additionally, very occasional acceptance of meals or tickets to public sporting, cultural or social events may be accepted if attendance is justified as being in the organisation’s business interest. But it will be for the employee and his/her Director or the Chief Executive to demonstrate clearly that acceptance was in the organisation’s interest and this should be recorded in the relevant form for retention in the register.

6.7 The main point is that in accepting hospitality employee’s need to be aware of, and guard against, the dangers of misrepresentation or perception of favouritism by a competitor of the host.

6.8 No hospitality, of any kind, should be accepted by anyone involved in the procurement phase of a contract unless the approval of the Chief Executive is received in advance and in writing.

6.9 All invitations received in respect of Entertainment or Hospitality, whether accepted or declined, must be recorded using the Register of Gifts and Hospitality form and approved by a Director/Chief Executive.

6.10 To sum up, in deciding whether hospitality can be accepted, employees should consider if it:

- is likely to help business effectiveness;
- places no obligation or perceived obligation on the recipient;
- is not frequent, lavish or prolonged;
- is unconnected with any decision affecting the organisation or the individual offering it;
- can be justified; and
- provides benefits to the organisation, which outweigh the risk of possible misrepresentation of the hospitality.