

Hospitality and Gifts Register

1 Introduction

- 1.1 There will be occasions when Council employees are faced with the difficulty of deciding whether or not to accept gifts or offers of hospitality during the course of their work.
- 1.2 The Council has adopted a employee code of conduct based on the Employers Organisation Code of Conduct for Local Government Employees and it is committed to observing the principles of that code in relation to “Hospitality and Gifts”.
- 1.3 The policy applies to all employees (permanent, temporary and casual), contractors and those in partnership roles working for the Council on Council premises, for example, agency employee, builders, and drivers. It also covers suppliers and those providing services under a contract with the Council in their own premises, for example, care homes.
- 1.4 With the increasing involvement of the private sector in the functions of Local Government, the situation is even more delicate and whilst it is impossible to cover every set of circumstances, this policy is intended to assist employees in making the right decision in any given set of circumstances.
- 1.5 In order to demonstrate clearly that appropriate actions have been taken in these matters, a Hospitality and Gifts Register (The Register) will be introduced within each Directorate to record when hospitality or gifts have been offered or accepted. This will be subject to monitoring and regular review.
- 1.6 The National Joint Council for Local Government Services (“Green Book”) refers to official conduct at Part 2, paragraph 2.1 and states that

Employees will maintain conduct of the highest standard such that public confidence in their integrity is sustained.

- 1.7 Any offer, gift, favour or hospitality directed at an employee personally should be treated with extreme caution as the person or organisation making the offer may be doing or hoping to do business with the Council. Under no circumstances should employees allow themselves to be put in a position, which gives the impression that improper influence has been present in the Councils dealings. This includes the acceptance of any item/offers that might be regarded as an inducement from clients or contractors of the Council. Minor items, such as pens, diaries or calendars, which are of only nominal value, could however on occasion be accepted.
- 1.8 If an employee is of the opinion that an offer of gift has been made or hospitality offered, in order to seek some advantage with the Council, then this should be brought immediately to the attention of their Group Director/Assistant Chief Executive, the Chief Executive (in the case of Executive Directors) or the Leader, (in the case of the Chief Executive) who will inform Internal Audit or the Group Director, Finance and Commercial.

2 Gifts

- 2.1 Except for minor promotional gifts distributed to a wide range of people and not uniquely given to that individual, (e.g. pens, calendars, diaries, charts, measures etc. usually given at Christmas time for use in the office), employees should refuse any gift offered to them or to members of their family by a person or organisation which has, or seeks, dealings with the Council.

3 Hospitality

- 3.1 Where an employee is invited to lunch or some other function by a person or organisation, which has, or seeks, dealings with the Council, the propriety of accepting the invitation should be considered carefully. The principal criterion in assessing whether or not to accept hospitality is whether if the matter became known, it would suggest the presence of improper influence or would affect public confidence in the employee or the Council. The level of any hospitality which following consideration, is accepted should always be of a modest nature.

4 Refusal of Hospitality and Gifts

- 4.1 It is not possible to give a complete list of circumstances where hospitality and/or gifts should be refused. The list set out below provides examples. However the rule must be that, if employees are in doubt, they should seek advice/approval from their Group Director/Assistant Chief Executive, the Chief Executive (in the case of Group Directors) or the Leader, (in the case of the Chief Executive).
- 4.2 The following offers of gifts and hospitality should be refused:
- Money
 - Holiday or Hotel Accommodation
 - Use of a company flat or car
 - Frequent Hospitality from one source
 - Extravagant meals at expensive restaurants
 - Concessionary rates which are not, as a matter of practice, available equally to other organisations/individuals
 - Invitations to 'events' where the employee is not attending in an official capacity or the function is clearly not relevant to the Council e.g. Wimbledon, Golfing tournaments, Horse racing etc.

5 Procedure for Hospitality & Gifts Register

- 5.1 The following procedure should be adopted where hospitality or gifts are offered to you by an external organisation.
- 5.2 Whilst inexpensive diaries, pens and calendars, need not be recorded, every other offer of hospitality or gifts must be recorded in the Register whether it is accepted or not. If in doubt, enter it on the register.
- 5.3 The Register is maintained on a Directorate basis. Information regarding hospitality & gifts must be recorded consistently within the Directorates across

the Council. Contact names of the employee responsible for the Register in your Directorate are listed at the end of this document..

- 5.4 Hospitality slips are controlled stationary and hence there should be no photocopying. The person responsible for all controlled stationary is the Corporate Services Manager. Entry slips for registering hospitality will be held by Directorate register holders. If you are unable to locate an entry slip, you should contact your line manager, who will arrange for an entry slip to be provided.
- 5.5 Each entry slip has a unique number and comprises of three sections. You should complete Section one (the person being offered the hospitality/gift) and send it to your appropriate register holder.
- 5.6 The register holder will arrange for the Group Director/Assistant Chief Executive, Chief Executive or Leader to complete sections two and three. They will retain section two and return section three to you within seven days, indicating whether agreement to accepting the hospitality/gift is given and recorded.
- 5.7 If you do not receive the completed entry slip within the timescale stated in section 5.6, you should contact your Directorate's register holder. The receipt is your proof of making the appropriate entry on the Register.
- 5.8 If your acceptance of the hospitality/gift is agreed, you should proceed as appropriate.
- 5.9 If your acceptance of the hospitality/gift is not authorised on this occasion you should make immediate arrangements to ensure the hospitality/gift is declined or returned if the gift has already exchanged hands.
- 5.10 If you disagree with the decision of your Group Director/Assistant Chief Executive, Chief Executive or Leader you should arrange to discuss it with him/her.
- 5.11 If your Group Director/Assistant Chief Executive, Chief Executive or Leader upholds their original decision, after discussion with you, there is no appeal against this and you must therefore abide by that decision.
- 5.12 If your Group Director/Assistant Chief Executive, Chief Executive or Leader changes their original decision after discussing the matter with you, this will be confirmed to you in writing.
- 5.13 For further advice on this procedure contact Human Resources.

6 Maintaining the Register

- 6.1 As stated in 5.3, it is important for information regarding hospitality & gifts to be recorded consistently within the Directorates across the Council. Those responsible for the Register should ensure that they;
 - i) Keep all completed hospitality/gift entry slips in a Ring Binder
 - ii) Record relevant information in a hard back book (labelled Hospitality/Gifts Register) using the following headings in each column.

- Name of Employee & Section
- Hospitality/Gift Form No. & Date form sent
- Date completed form received
- Date receipt sent to employee

7 Monitoring

- 7.1 Human Resources will monitor compliance with this policy and procedure. The policy and procedure will be subject to regular review on the basis of good practice and monitoring data.
- 7.2 Directorate Hospitality/Gifts Registers should be reviewed annually by the relevant Group Director/Assistant Chief Executive

8 Conclusion

- 8.1 All employees should adhere to this policy. If an employee breaches the policy, this could lead to disciplinary action and potential dismissal.

Those responsible for the Hospitality/Gift Register in your Directorate

Owner	Directorates
Nikki Richardson Ext 2170	Chief Executive ACE's Finance and Commercial
Sharon Trussell Ext 2252	Sustainable Communities
Jenny Sheppard Ext 4258	Children's Services
Julia Pearman Ext 2328	Public Realm