



Employees may find it useful to consider the following factors when considering whether the acceptance of a gift, gratuity or hospitality is reasonable:

G Genuine – is the offer made for genuine reasons without encouragement and with no potential for a reasonable member of the public to consider acceptance inappropriate?

I Impartial – if accepted, would a reasonable member of the public be confident that the Council is impartial and will remain impartial?

F Free – would it be clear to a reasonable member of the public that the donor does not expect any favourable treatment from the Council or its members in return?

T Transparent – has the gift, gratuity or hospitality has been declared openly to the Council, to colleagues and the public?

If the answer to any of the foregoing questions is 'NO' then the offer of a gift, gratuity or hospitality must be declined. In addition the offer must be declared using the Gifts, Gratuities and Hospitality Registration Application.

Offers Not Subject To Notification and Registration

The following are examples of circumstances that do not require the submission of a Gifts, Gratuities and Hospitality Registration Form:

- a) The acceptance of refreshment (non-alcoholic) where payment would not normally be expected e.g. whilst attending a work related meeting.
- b) The giving and receiving of personal gifts, gratuities unconnected with the individual's employment, provided such acts could not reasonably be expected to compromise public confidence in the impartiality of the Council.
- c) Items such as pens, folders or diaries worth less than £25 provided to attendees at a conference or training course.
- d) Tokens of appreciation, valued at no more than £25, provided by partner agencies to, for example, speakers at official events or in recognition of assistance provided.

- e) The voluntary giving and receiving of gifts, gratuities, hospitality between employees as tokens of appreciation on retirement, birthday, transfer of employment, religious event, etc.
- f) Working lunches provided by public and professional bodies.
- g) The voluntary giving and receiving of gifts between pupils and employees within Education.

Registration

The Gifts, Gratuities, Hospitality Registration Form must be completed in respect of all applicable:

- a) Gifts / Gratuities offered (accepted or declined)
- b) Gifts / Gratuities received (accepted or declined)
- c) Hospitality offered (accepted or declined)
- d) Hospitality received (accepted or declined)

This form must be completed and requires details of the Strategic Lead who authorises refusal or acceptance on behalf of the Council.

The form must then be forwarded to the Corporate Fraud Team who will maintain a central record.

Gifts and Gratuities That Must Not Be Accepted

The following are examples of circumstances where gifts, gratuities and hospitality may not be solicited or accepted and in all instances require the submission of a Gifts, Gratuities and Hospitality Registration Form:

- a) Any gift of cash.
- b) Any gift of alcohol.
- c) Where it could reasonably be perceived that the provider has an ulterior or dishonest motive including any belief that acceptance may foster an expectation of action, or inaction, in return.
- d) Any gift or gratuity valued at more than £25, or part of a series of smaller donations totalling more than £25, from a commercial interest that is, or could be perceived to be, connected in any way with any current, future or past relationship with the Council.

- e) The soliciting or acceptance of free or discounted goods/services, unless the discount or price offered is advertised as available to the public, or is within the employee benefits scheme.
- f) Where the provider is, or could be perceived to be a person involved in Serious Organised Crime, or any other person or organisation whereby it could reasonably be expected that acceptance of such a gift, gratuity or hospitality would compromise public confidence in the impartiality and integrity of the Council.

Hospitality That May be Accepted

The following are examples of hospitality that may be accepted and require the submission of a Gifts, Gratuities and Hospitality Registration Form:

- a) A working lunch of modest standard in the course of visits or meetings in order that the parties can continue to discuss business relating to the aims of Council. Wherever possible the business of Council shall be conducted on Council premises, or the premises of a partner, with 'working lunches' therefore being the exception rather than the norm.
- b) Provision of a meal ancillary to a conference or dinner attended as an official representative of the Council but only when the organisational benefit can be clearly demonstrated and would, to a reasonable member of the public, outweigh any possible personal benefit.

Advice and prior approval from a Strategic Lead must be sought If there is any doubt as to whether hospitality is acceptable or not.

Hospitality That Must Not Be Accepted

The following are examples of hospitality that must not be accepted and require the submission of an online Gifts, Gratuities and Hospitality Registration Form:

- a) Other than an unavoidable modest working lunch, any hospitality received from a commercial interest that is, or could be perceived to be, connected in any way with a current, future or past relationship with the Council.
- b) Offers of free or subsidised accommodation, holidays, travel, weekend breaks, invitations to sporting occasions or entertainment, where personal benefit would, to a reasonable member of the public, outweigh any possible organisational benefit.
- c) Offers that are made exclusively to a specific post holder.

- d) Offers of free or subsidised entry to any premises licensed by a local authority. This will include bars, clubs and places of entertainment.

Declining or Returning Unacceptable Offers

Offers of inappropriate gifts, gratuities and hospitality will be politely refused with an explanation that acceptance is contrary to Council policy.

Tact and sensitivity will often be required so as not to cause any unnecessary offence. However, it is important that members of the public are aware that an inappropriate offer cannot and will not be retained.

An exception to this is where returning or declining an offer would cause extreme and unnecessary offence. In such circumstances it may be appropriate to donate the gift or gratuity to charity.

There may also be occasions when an offer is not handed over personally but is, for example, posted or left at a public office. On receipt of any unacceptable offers the donor must be contacted and the item returned with a sensitive explanation of why acceptance is not appropriate. If the donor has not provided their details then, if appropriate, the offer should be donated to an appropriate local charity.