

Gifts and Hospitality policy

1. This policy applies to all Members of the Business Board.
2. This policy does not prohibit normal and appropriate hospitality (given and received) to or from third parties. However, hospitality is an area in which you must exercise careful judgement. There is a need to distinguish between low cost hospitality of a conventional type, for example, a working lunch, compared with more expensive and elaborate hospitality. Hospitality should not extend to spouses unless the circumstances fully justify this and it is authorised by the Head of Delivery & Governance
3. You must within 28 days of receipt, notify the LLBSP Head of Delivery & Governance in writing of any gift, benefit or hospitality with a value in excess of £25 which you have accepted as a Member of the Business Board from any person or body other than the LLBSP or the Upper Tier Local Authorities.
4. All gifts, benefits and hospitality should be recorded on the Corporate Gifts and Hospitality Register.
5. You may accept "incidental" hospitality, such as light refreshments, lunch and drinks, as offered at a visit, conference, meeting or promotional exercise.
6. There may be instances where you may receive invitations to events offered as part of normal working life – for example, opening celebrations, receptions, luncheons, annual conferences and dinners. If attendance at such events is considered important in building and maintaining relationships with these sectors and the hospitality received is likely to be reasonable, then these may be acceptable.
7. You should discourage third party individuals and organisations from offering gifts. You may, however, accept token items of very low value (less than £25), for example stationery, diaries, calendars, chocolates, etc., usually distributed by companies as a promotional exercise. This does not, however, extend to gifts offered by third parties who are involved in active tenders.
8. This type of gift should be distinguishable from more expensive or substantial items which cannot on any account be accepted. If there is any doubt as to

whether the acceptance of such an item is appropriate or the value exceeds £25, you should consult with the Head of Delivery & Governance.

9. If gifts have a higher value than £25, you should tactfully refuse them. If gifts of this value are delivered, they should be returned immediately with an appropriate explanation. If gifts cannot be returned, the member should dispose them to charity and record this fact.
10. Gifts of cash or cash equivalent (vouchers, for instance) should not be accepted in any circumstances.
11. You must ensure that you read, understand and comply with this policy.
12. The prevention, detection and reporting of bribery and other forms of corruption are the responsibility of all those working for the LLBSP and the Business Board or under its control. All Members are required to avoid any activity that might lead to, or suggest, a breach of this policy.
13. It is important to inform the Head of Delivery & Governance as soon as possible if you are offered a bribe by a third party, are asked to make one, suspect that this may happen in the future, or believe that you are a victim of another form of unlawful activity.