



**Officer
Gifts and Hospitality
and Registering Interests
Policy**

To be approved by Audit and Standards Committee 14 November 2023

1. This policy is intended to complement the council's Employee Code of Conduct and Disciplinary Procedures and offers guidance for officers with regards to best practice and the need to preserve integrity and demonstrate good governance. It has been written to protect the officer as much as to protect the council. The intention of the policy is to ensure that the council can demonstrate that no undue influence has been applied or could be said to have been applied by any supplier or anyone else dealing with the council and its stewardship of public funds.
2. Officers of the council are bound by specific rules, codes of conduct and protocols, as are Members. Officers shall not use their authority or office for personal gain and shall seek to uphold and enhance the standing of the council by:
 - Maintaining a high standard of honesty and integrity in all their business relationships;
 - Complying with the law, regulations and the council's own policies and procedures;
 - Rejecting any business practice that might be deemed improper; and
 - Placing the interests and the reputation of the council first when acting for or on behalf of the council.
3. As a general rule, ***business gifts and hospitality should not be accepted by any member of staff.*** [Employees should treat with caution any offer of a gift or hospitality - The general test of caution is one of common sense. Would the public question the appropriateness of hospitality or gifts received by the officer? Staff are ultimately responsible for their decisions on the acceptance of gifts or hospitality and for ensuring that any gift or hospitality can stand up to public scrutiny and does not bring the council into disrepute.](#) On the other side of the coin, officers often do not wish to cause offence by rejecting a gift or offer of hospitality, for example when a member of the public wants to reward good service by offering [a token gift of either](#) chocolates or a bottle of wine. It's about where we draw the line.
4. Personal interests that may impinge or might reasonably be deemed by others to impinge on an employee's impartiality or conflict with the duty owed to the council should be declared in writing. These could be an officer's interests outside work, membership or affiliations to societies or clubs, business interests etc. Anything that may lead to allegations of bias or favouritism; whether it is financial or political, should be ~~declared~~[declined](#).
5. The council must be able to show that all its decisions are reached on the basis of value for money for the public and no other reason. Any consideration of whether or not the principles of this policy have been breached will be determined by reference to this principle.

6. Any breach of this policy and the associated codes of conduct could lead to disciplinary action being taken.
7. It is always best to seek a second opinion as to the appropriateness of any gift, hospitality, or regards any interests held outside the council that may be construed as influential, leading to favouritism. If you register the gift, or hospitality you received, or interest you have, it is then on the public record and open to scrutiny if necessary. It cannot later be alleged that the gift or hospitality was accepted, or interest held, in a secret, 'underhand' way, with an ulterior motive.
8. If a gift is received or hospitality accepted **up to the value of £25**, unless it is of purely "token" value (e.g. diary, pen, free gift at an exhibition), it should be declared using the on-line register from on the HUB for inclusion in the council's register.
9. Prior to accepting any gift or hospitality with a **value of £25 or more**, the Officer should seek authorisation from their immediate line manager, or their Corporate Director. Only once consent has been given should the Officer take ownership and complete the on-line register form. Documentation supporting the acceptance should be passed to the Head of Governance and Business Support immediately.
10. In the instances where the officer in receipt of the gift or hospitality over the value of £25 is a the senior officer or a key decision maker. Chief Executive is in receipt of a gift or hospitality over the value of £25, approval must be sought from the Chief Executive prior to accepting. In the instance where the Chief Executive is in receipt of a gift or hospitality over the value of £25, approval must be sought from the Leader of the council. However, if both the Chief Executive and the Leader of the Council are both in receipt of a gift or hospitality over £25, approval must then be sought from the Cabinet.
11. If gifts are received from the same source which cumulatively, are over the value of £25 in a 12 month period, then these must be declared and the officer should seek authorisation from their manager, their Corporate Director or in compliance with the authorisation in paragraph 10 above.
12. The council **prohibits** the acceptance of cash gifts of any value.
13. Any personal interests that may impinge or might reasonably be deemed by others to impinge on an officer's impartiality, or cause conflict with the duties of a council officer as detailed above (such as conflicting business interests) should be declared in writing to the officer's line manager. The details should then be passed to the Head of Governance and Business Support to be entered onto the council's register.
14. ~~In relation to conventional hospitality (lunches, golf days, etc) these should only be accepted provided that it is normal and reasonable in the circumstances to do so. An invitation that appears over generous should be declined; it could be seen as an inducement to affect a council decision. Again, you must declare the~~

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~~hospitality and it is advisable to discuss the offer with your line manager if you are in any doubt as to the motive.~~

~~45.14.~~ Any officer who is aware of any business dealings conferring personal gain, or involving relatives or associates of a member of staff must supply these details to the Head of Governance and Business Support for entry into the register. The council's Whistle Blowing Policy can be used to divulge such information in confidence.

~~46.15.~~ The council's Monitoring Officer and Audit and Standards Committee will inspect the register of gifts, hospitality and interests annually, and the information will be retained for a period deemed necessary to demonstrate good governance and to address any allegations of misconduct accordingly.

~~47.16.~~ The effectiveness of this policy will be reviewed regularly by carrying out various training / refresher exercises.

REMEMBER >>> If in doubt, declare it!!

1. **Token gifts** with no real monetary value can be accepted and do not need to be declared. These include calendars, diaries, pens etc. If you are in any doubt as to the classification of token gifts, just ask.
2. **Gifts under £25** in value can be accepted but must be declared to your line manager and reported using the on-line form on the HUB for inclusion on the council's register.
3. **Gifts over £25** in value must not be accepted without prior permission from line management or Corporate Director. If the officer is a senior officer or key decision maker then authorisation must be sought from the Chief Executive. If authorisation is given, and the gift accepted, it must then be registered as above.
4. **Declaration of Interests**; if you feel that a personal involvement outside of work may affect judgements made in work, or be construed as doing so, these must be declared and registered as above.
5. **Cash gifts of any value are strictly prohibited!**

Some useful links / contacts

Employee Code of Conduct	https://wyregovuk.sharepoint.com/sites/HumanResourcesDepartment/SitePages/Policies-and-procedures.aspx
Whistleblowing policy	https://wyregovuk.sharepoint.com/sites/Governance/SitePages/Counter-fraud-and-corruption.aspx

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Anti- Fraud, Corruption and Bribery	https://wyregovuk.sharepoint.com/sites/Governance/SitePages/Counter-fraud-and-corruption.aspx
Disciplinary Policy	https://wyregovuk.sharepoint.com/sites/HumanResourcesDepartment/SitePages/Policies-and-procedures.aspx
Head of Governance and Business Support	Joanne.billington@wyre.gov.uk or telephone 01253 887372
Monitoring Officer	Mary.grimshaw@wyre.gov.uk or telephone 01253 887214
Deputy Monitoring Officer	Jane.collier@wyre.gov.uk or telephone 01253 887506

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