

## The Marches LEP Gifts and Hospitality Policy

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### Guidance

The following guidelines relate to the acceptance of gifts and/or hospitality:

1. The acceptance of any gift and/or hospitality could be regarded by a third party as compromising or likely to compromise impartiality and objectivity. The giving of gifts or hospitality of significant value should be avoided as it may be construed as a bribe.
2. Where any gift and/or hospitality is offered by a person or organisation seeking business with the Non-Executive Director (or other relevant individual) it is necessary that caution is exercised.
3. Gifts, entertainment and hospitality is identified by the receipt or offer of gifts, meals, invitations to functions and events in relation to membership of the Marches LEP Board or sub-boards. The above items are acceptable, if they align with reasonable boundaries that include occurrence and value. If the hospitality, entertainment or gift is inexpensive, routine and only very occasional, it is acceptable to accept. However, if the gift, entertainment or hospitality is more frequent and/or at a higher value than the accepted threshold of £50, then it is advisable to decline.
4. Given the significant representational role of Non-Executive Directors, they may accept tickets to sporting, cultural or social events, unless there is a contractual (or potential contractual) relationship with the donor and assuming attendance is appropriate. Acceptance will generally only be appropriate in isolated instances. Accepting frequent, regular, annual or seasonal invitations (particularly from the same source) would normally go beyond the accepted standards of conduct. Where such tickets are accepted, they must be logged in the register. The key test is whether attendance is consistent with the general rules on acceptance of gifts and hospitality and is in the interest of the company and will it further its objectives – and normally this will mean that there will be an opportunity to discuss official business. This must be clearly demonstrable, since the fact that tickets could not become the property of the company in the way that another gift would, may make them look like a personal gift and thus more open to public criticism.
5. The basis is that all gifts should be declined, unless the gift is of a promotional, seasonal or trivial nature such as diaries, calendars pens and so on if they bear company names and logos from which they are provided. These gifts should not exceed a value of £50. If a token gift is presented by an organisation it may be accepted if it has been authorised by the relevant member of staff.
6. Overnight accommodation and prestigious events unrelated to Non-Executive Directors (or other relevant individuals) carrying out their Marches LEP duties should be declined. Equally, lavish or extravagant gifts and/or hospitality should not be accepted.
7. Where Non-Executive Directors (or other relevant individuals) are involved in visits which entail all day meetings/events, it is reasonable to accept refreshments. The frequency and the nature of events should be considered.
8. Reasonable gifts and hospitality given or received for the purposes of cementing relations with business contacts will be acceptable. All gifts and hospitality over the value of £50 accepted by the Non-Executive Director (or

other relevant individual) must be recorded in the register within 10 working days of acceptance. For any gift that has been accepted, it should be made clear the gift was accepted on behalf of the Marches LEP.

9. When gifts are received and have to be returned, they should be sent back to the donor with a covering letter explaining the Marches LEP's rules and policy.
10. Money or anything readily convertible to money should never be accepted as a gift. This includes loyalty or discount cards that can be viewed as benefiting the individual.

### **The Gifts and Hospitality Register**

The Marches LEP Director will maintain the register. This responsibility includes:

- Making sure the register is properly maintained;
- Reviewing the entries with a view to checking, to the best of his/her knowledge, that it is complete, and that the rules are being observed;
- Reporting to the LEP Board on an annual basis;
- Keeping a record of the carrying out and date of these checks; and
- Publishing the register onto the Marches LEP website on an annual basis.

## Marches LEP - Gifts and Hospitality Register

	<b>Date</b>	<b>Person or Organisation providing gift or hospitality</b>	<b>Details of the gift or hospitality</b>	<b>Value (£)</b>	<b>Name(s) of those receiving offer of, or gift or hospitality</b>	<b>Decision</b>
<b>Guidance</b>	Date the gift or hospitality was received.	Both the name of the organisation and organisation representative or individual as appropriate.	Brief description of item, ie, dinner at X, case of wine, holiday.	If actual value is not known enter estimated. If offered to more than one person enter total value.	The names of all Shropshire Council staff and employees (including agency, contractors and their employees employed on behalf of the authority) and names of relative or partner, if appropriate, should be recorded.	State whether offer was 'Declined' 'Accepted and donated to charity' or 'Accepted'. For donations to charity state name of charity.