

# Gifts and Hospitality Policy



A group of four independent statutory Land Drainage, water levels and Flood Risk Management Authorities working collectively under a partnership agreement in accordance with section 11(5) of the Land Drainage Act (1991).

*Four Independent Boards:*

- *Witham First District Internal Drainage Boards*
- *Witham Third District Internal Drainage Boards*
- *Upper Witham Internal Drainage Boards*
- *North East Lindsey Internal Drainage Boards*

**Version:** 04

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**Date of Approval by Joint Services Committee (JSC) on behalf of North East Lindsey (NEL), Upper Witham (UW), Witham First District (W1) and Witham Third District (W3) IDBs:** 09th December 2024

**Policy Owner:** Director of Finance and Governance (RFO)

**Author supporting review:** Risk Manager

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## 1.0 - Introduction

This Policy sets out all the Boards stance on the acceptance of gifts and hospitality in accordance with the Bribery Act 2020.

### 1.1 – Aim of the Policy:

The aim of this policy is to protect employees conflicts of interest or acceptance of the gift which could affect the employee’s contact or perceived to do so.

### 1.2 – Equality, Diversity and Inclusion:

This policy aims to meet the requirements of the Equality Act 2010 and ensure that no employee receives less favourable treatment on the grounds of gender, sexual orientation, transgender, civil partnership/marital status, appearance, race, nationality, ethnic or national origins, religion/belief or no religion/belief, disability, age, carer, pregnancy or maternity, social status or trade union membership.

## 2.0 – Gifts and Hospitality Policy

### 2.1 – General considerations of the Policy

Gifts of a very low monetary value are permitted (£25.00 or below); Employees are permitted to accept offers of gifts above the low monetary value and/or corporate hospitality on the condition that prior authorisation is sought from the employee’s line manager and providing there is no conflict of interest or acceptance of the gift which could affect the employees contract or perceived to do so.

Employees should be aware of the definitions of ‘gift’ and ‘hospitality’ in 2.2 & 2.3.

Employees are advised to use their judgment on whether a gift would meet the definition of “appropriate”. When considering this, employees should take into account the bearer of the gift and context in which it is offered. Could it be seen as an incentive during an initial tender to exercise, for example; Employees who require clarification on the appropriateness of an offer must speak with their line manager before acceptance of such.

Please also refer to the Employee Handbook and the Anti-Bribery Policy, including the procedures outlined for the Gift Register process for the Boards.

### 2.2 – Definition of gift includes

Gifts Include:

- money
- goods (flowers, vouchers, food, drink, event tickets when not used in a hosted business context)

- services or loans given or received as a mark of friendship or appreciation.

## 2.3 – Definition of Hospitality includes

Hospitality includes:

- entertaining
- meals or
- event tickets (when used in a hosted business context) given or received to initiate or develop relations.

## 2.4 – Boards stance on Gifts and Hospitality

The Boards recognise that the giving and receiving of gifts and hospitality where nothing is expected in return helps form positive relationships with third parties, where it is proportionate and properly recorded. This does not constitute bribery and consequently such actions are not considered a breach of this policy.

Hospitality will become a gift if the host is not present.

No gift should be given nor hospitality offered by an employee (or anyone working on the 4 Boards' behalf) to any party in connection with the Boards' business without receiving prior written approval from one of either the Chief Executive, Director of Operation, Director of Engineering & Technical Services, or the Director of Finance and Governance. Similarly, no gift nor offer of hospitality should be accepted by an employee or anyone working on the 4 Boards' behalf without the prior written approval from either the Chief Executive or Directors of Finance and Governance, Operations or Engineering & Technical Services.

A record will be made of every instance in which gifts or hospitality are given or received. The record will be maintained by the Executive Assistant in the Gifts and Hospitality Register.

## 3.0 – Gifts and Hospitality Policy Statement

The Boards recognise that the giving and receiving of gifts and hospitality where nothing is expected in return helps form positive relationships with third parties, where it is proportionate and properly recorded. This does not constitute bribery and consequently such actions are not considered a breach of this policy.

The Board ensure that employees are not in a difficult position by:

- Following this Policy
- Discussing if gifts and hospitality need to be documented
- Having an open door policy for the employees to raise queries

## 4.0 - Glossary / Definitions

Word/ term	Definition

## 5.0 – Legislation & other partner organisation documents

- Fraud Act 2006
- The Bribery Act 2010
- The Equalities Act 2010
- Local Policy in line with ADA Lincolnshire Branch White Book.

## 6.0 – Roles and Responsibilities

### 6.1 Arrangements for roles and reporting lines

The arrangements and organisational responsibilities for implementing the policy are detailed in this section.

#### 6.1.1 – Board Members

- Review and approve the Policy at periodic intervals
- Support the SMT in the enactment of the Policy

#### 6.1.2 – Chief Executive Officer (CEO) and Senior Management Team (SMT)

- Comply with this policy and lead by example.
- Cascade this policy and ensure it is available to all staff members.
- Respond to any queries raised by employees over the application of this policy.

#### 6.1.3 – Line Managers / Supervisors / Foremen

- Support the CEO & SMT to cascade the policy, and lead by example.
- Ensure the policy is followed by all team members.

#### 6.1.4 – All Staff members

- Employees are to follow this policy and report any gifts or hospitality in line with the Policy.
- Comply with reasonable requests of the employer.

## 7.0 - Document review:

Version	Date	Reviewed by	Changes	Approved by/ date
V3	July 2020	Associate Director of HR	Review and update	JSC 2020
4.00	November 2024	Risk Manager & SMT	Periodic Review and new template	JSC December 2024

This policy is due for review at 5 yearly intervals, unless a review is required before e.g. change to management, process or anything which may affect the contents of this policy.

## 8.0 - Supporting documents and forms (Annex)

No additional or supporting documents.