



## GBSLEP Gifts and Hospitality Policy

### Introduction

The aim of the Greater Birmingham and Solihull Local Enterprise Partnership's (GBSLEP's) Gifts and Hospitality Policy is never to create an obligation on either party as a result of hospitality, but that such occasions will be used to enhance our professional working relationships.

The intent of this Policy is not to discourage or prevent the acceptance of hospitality where this is helpful to further the interests of GBSLEP: the Nolan Committee accepted that there were advantages in officials continuing to be free to accept invitations to working lunches and dinners and for those with a representational role to attend other events.

Nor is it intended to imply a lack of trustworthiness on the part of Non-Executive Directors or Board members, but rather it is intended to demonstrate probity and protect those working within the GBSLEP's governance structure from any suspicion (no matter how unfounded) of misconduct.

### Scope

This Policy applies to all GBSLEP Non-Executive Directors, Pillar & Sub-Board Members and relevant LEP Executive members. The appropriate attached form must be completed by these individuals.

Where Non-Executive Directors and Pillar and Sub-Boards Members are covered by the Gifts and Hospitality Policies of their own organisations, for example those from local authorities and higher or further education, they are not expected to complete the attached form for GBSLEP *if* they are registering all relevant gifts and hospitality with their own organisations. This should include all gifts or hospitality received or given whilst carrying out GBSLEP duties. In this case, the individuals are expected to share the relevant forms / information with the GBSLEP Director to save completing two separate sets of documentation.

The GBSLEP Executive comprises staff employed by GBSLEP and by Solihull Metropolitan Borough Council. Solihull Metropolitan Borough Council employees are subject to that local authority's Gifts and Hospitality Policies. As such, the attached form does not need to be completed so long as the relevant forms are shared with the GBSLEP Director.

### Guidance

The guidelines for the acceptance of gifts and/or hospitality are as follows:

- 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.

- 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.
- 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 GBSLEP Board, sub-boards, or the GBSLEP Executive. 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.
- Given the significant representational role of Non-Executive Directors and certain senior members of the GBSLEP Executive, 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.
- 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.
- Overnight accommodation and prestigious events unrelated to Non-Executive Directors (or other relevant individuals) carrying out their GBSLEP duties should be declined. Equally, lavish or extravagant gifts and/or hospitality should not be accepted.
- 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.
- 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 GBSLEP.
- When gifts are received and have to be returned, they should be sent back to the donor with a covering letter explaining the GBSLEP's rules and policy.

- 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 GBSLEP Director will arrange to 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 GBSLEP website on an annual basis.

**December 2019**



## GBSLEP Gifts and Hospitality Form – Board and LEP Executive Members

Name of Person receiving gift or hospitality, or offer of gift or hospitality / giving or offering gift or hospitality and role within GBSLEP

Details of the gift or hospitality received/offered/given (specify as applicable)

Date hospitality given, offered or received	Description of Gift or hospitality	Received from/Offered to (name & details of person/organisation from whom gift /hospitality received or offered, or to whom it was given or offered)	Estimated or Actual Value (if known)

I have read and understood the Greater Birmingham and Solihull Local Enterprise Partnership Gifts and Hospitality Policy.  
 I have completed this form as fully as possible and all information provided is truthful and correct to the best of my knowledge.

**Signed**

*Please return completed forms to: [helen.harper@gslep.co.uk](mailto:helen.harper@gslep.co.uk) or Greater Birmingham & Solihull Local Enterprise Partnership, Baskerville House, Centenary Square, Birmingham, B1 2ND.*

**FOR OFFICE USE ONLY**

Date received: