

BEDFORD GROUP OF DRAINAGE BOARDS

INCORPORATING BEDFORDSHIRE AND RIVER IVEL IDB, BUCKINGHAM AND RIVER
OUZEL IDB, ALCONBURY AND ELLINGTON IDB

GIFTS AND HOSPITALITY PROTOCOL

Introduction

This protocol provides rules (**set out in bold type**) and guidance for both Board members and employees of The Bedford Group of Drainage Boards. This should be followed in conjunction with the Boards' Bribery Act Policy and the Board Members' Code of Conduct and the Employee Code of Conduct Policies.

General Caution

Treat with extreme caution any offer or gift, favour or hospitality that is made to you personally which may possibly be perceived to be in connection with your position as a board member or employee.

Your personal reputation and that of the Boards can be seriously jeopardized by the inappropriate acceptance by you of a gift or hospitality.

The acceptance of favours, gifts and hospitality is not always unlawful or inappropriate. The decision for you in every case is whether or not it is appropriate to accept any gift or hospitality that might be offered to you, having regard to how it might be perceived.

No hard and fast rules can be laid down to cover every circumstance as to what is appropriate or inappropriate. This protocol offers general principles to enable you to make your own decisions.

Criminal Law

It is a criminal offence to solicit or receive any gift, reward or advantage as an inducement to doing or forbearing to do anything in respect of any transaction involving the Boards.

The onus would be on you to disprove corruption in relation to a gift from a person holding or seeking to obtain a contract from the Boards.

Limits of Guidance

This protocol does not apply to:

- gifts and hospitality you may receive from family and friends (as a birthday or other festive presents) that are not related to your position as a member or employee of the Boards. You should, however, question any such gift or hospitality offered from an unusual source.
- the acceptance of facilities or hospitality provided to you by the Boards.

- Gifts given to the Boards that you accept formally on their behalf and are retained by the Boards and not by you personally.

Meaning of Gifts and Hospitality

Gifts and hospitality include the:

- offer of favours, or the promise or implied promise of future favours, gifts or hospitality.
- free gift of any goods or services;
- opportunity to acquire any goods or services at a discount or at terms not available to the general public;
- opportunity to obtain goods or services not available to the general public;
- offer of food, drink, accommodation or entertainment or the opportunity to attend any cultural or sporting event.

Common gifts include pens, diaries, calendars and other business stationery, articles of clothing, books, flowers and bouquets. You should, however, be cautious when purchasing anything, when additional services, privileges or advantages are offered, which might be related to your position as a member or employee of the Boards.

Appropriate Gifts and Hospitality

There are some circumstances where you may accept gifts and hospitality as being in the normal course of your duties as a member, for example:

- Civic hospitality provided by another public authority or flood risk partner;
- Normal and modest refreshment in connection with any meeting in the normal course of your work as a board member or employee (eg. Tea, coffee, biscuits, working lunches);
- Small low value gifts (below £25, such as pens, calendars, diaries);
- Drinks or other modest refreshment in the normal course of socializing arising consequentially from the Boards' business (eg. inclusion in a round of drinks after a meeting);
- Modest meals provided as a matter of courtesy in the office or meeting place of a person with whom the Board has a business connection;
- Souvenirs and gifts from other public bodies intended as personal gifts (eg arising from other drainage board events).

Principles to apply in relation to Gifts and Hospitality

In deciding whether it is appropriate to accept any gift, favour or hospitality, you must apply the following principles:

- **Do not accept a gift, favour or hospitality as an inducement or reward for anything you do as a member or employee of the Boards. If you have any suspicion that the motive behind the gift or hospitality is an inducement or reward, you must decline it.** Reward includes remuneration, reimbursement and fee,

offered, paid, promised or implied.

- **Do not accept a gift or hospitality of significant value or whose value is excessive in the circumstances.**
- **Do not accept a gift, favour or hospitality if acceptance might be open to misinterpretation. Such circumstances will include gifts and hospitality:**

from parties involved with the Boards in a competitive tendering or other procurement process;

from parties where planning permission, consents and approvals required by the Boards may be involved.

- **Do not accept a gift, favour or hospitality if you believe it will put you under any obligation to the provider as a consequence.**
- **Do not solicit any gift, favour or hospitality and avoid giving any perception of so doing.**

Registration of Gifts and Hospitality

Board members and employees must, within 28 days of receiving any gift or hospitality or refusing any gift or hospitality offered, over the value of £25.00 record the item in the Gift and Hospitality Book.

Reporting of Inappropriate Gifts and Hospitality offered

It is a criminal offence for a person corruptly to give or offer any gift, reward or advantage as an inducement or reward to you for doing or forbearing to do anything as a member or employee of the Boards.

You must immediately report it to the Board Chairman, the Chief Executive or the Internal Auditor as appropriate.

You may thereafter be required to assist the Police in providing evidence.

This protocol will be reviewed within a period not extending beyond 5 years.

Date of Joint Management Committee approval: April 2018