

# Dovecotes TMO

## Gifs and Hospitality Policy



### **DOVECOTES BRIBERY PREVENTION, GIFTS AND HOSPITALITY - POLICY & PROCEDURES**

#### **1. Introduction**

1.1 This policy defines standards and guidelines in relation to adherence to the anti-bribery measures and standards that should apply to the acceptance and provision of gifts and hospitality. In particular, the policy is designed to comply with The Bribery Act 2010

1.2 The policy is set out under the following headings:

anti-bribery policy; dealing with contractors, agents and business partners; giving gifts and hospitality; receiving gifts and hospitality; compliance; conflicts of interest policy; reporting bribery, corruption and suspected non-compliance with this policy.

#### **2. Anti-bribery policy**

2.1 The TMO values its reputation for ethical behaviour and financial probity and reliability. The TMO recognises that any involvement in bribery is illegal and will reflect adversely on its image and reputation.

2.2 The TMO prohibits the offering, giving, soliciting or the acceptance of any bribe in whatever form to or from any person or company, public or private by any council member, member of staff, contractor, consultant, agent, overseas agent, external examiner and any non-employee service provider engaged on TMO business for whatever reason.

2.3 The prevention, detection and reporting of bribery is the responsibility of all staff and committee members

#### **3. Dealing with contractors, agents and business partners**

3.1 The Bribery Act 2010 highlights two specific types of bribery that could lead to prosecution of the TMO:

the liability to prosecution if a person associated with it bribes another person, where an associated person is one who performs services on or behalf of the organisation; and bribery of a public official, where an official is one who holds a legislative, administrative or judicial position in the UK.

3.2 This means that the TMO needs to take care to ensure that any contractors, agents or business partners acting on its behalf comply with the Act.

3.3 It is therefore essential that contractors and agents acting on the TMO's behalf are made aware of the TMO's anti-bribery policy, through the TMO's terms and conditions or through the tendering process for larger contracts. Reasonable due diligence must be carried out to ensure that they are not acting in a way that would compromise the TMO.

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### 4. Giving gifts and hospitality

4.1 Staff and committee members may not, directly or through others, offer or give any, money, gift, hospitality or other thing of value to an official, employee or representative of any supplier, customer or any other organisation, if doing so could reasonably give the appearance of influencing the organisation's relationship with the TMO.

4.2 Staff and Committee of Management members may:

give gifts of a nominal value (pens, diaries and advertising or promotional novelties); with management committee approval, provide meals and other entertainment at venues outside the TMO, provided that the expenses are kept at a reasonable level. For the avoidance of doubt, the per capita cost of a meal should not exceed £20 and would normally be much less; provide meals and overnight accommodation at Conferences where these are reasonable and in the normal course of TMO business or events.

### 5. Receiving gifts and hospitality

5.1 An employee or Management Committee member or any member of their family should not, directly or through others, solicit or accept money, gifts, hospitality or anything else that could influence or reasonably give the appearance of influencing the relationship with that organisation or individual.

5.2 Gifts or hospitality may not be accepted, irrespective of value, which might influence or be seen to influence such situations as the outcome of an exam, the award of business (contract) or the use of the TMO's Intellectual Property or other assets, or to benefit personally or for the benefit of any person connected to that person.

5.3 Unless you have been informed otherwise you may accept:

a gift of nominal value, such as an advertising novelty pen or diary, when it is customarily offered to others having a similar relationship with that individual or organisation; customary meals or entertainment provided that the expenses are kept at a reasonable level.

5.4 For the avoidance of doubt:

gifts with a value of more than £10 and hospitality expected to cost up to and not exceeding of £20 should be authorised by a line manager ;

gifts or hospitality in excess of £20 should be authorised by the Management Committee of the TMO.

5.5 If an excessive gift or hospitality is found to have been accepted, then your line manager or Management Committee will discuss the circumstances with you and agree how to deal with it e.g. a gift can be returned or steps can be taken to ensure that the acceptance of hospitality does not influence a decision or situation in favour of the giver. If excessive gift(s) or hospitality are accepted on more than one occasion or are found to have influenced decisions inappropriately, against TMO policy (or potentially illegally), then appropriate disciplinary procedures will follow.

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### 6. Compliance

6.1 All staff are required to comply with The Bribery Act 2010. The Senior Management Officer of the TMO and Chair of the Management Committee of the TMO are responsible for the TMO’s policy in relation to The Bribery Act 2010. Contact the above if further guidance is required.

### 7. Conflicts of interest policy

7.1 A conflict of interest occurs when you advance a personal interest (or that of others with whom you are connected) at the expense of the TMO.

7.2 Reference should be made to the TMO’s policy on declarations of interest and the register of interests.

### 8. Reporting bribery, corruption and non-compliance with this policy

8.1 If you know of, or have good reason to suspect that, an unlawful or unethical situation or that you suspect that either an act of bribery or non-compliance to this policy has occurred; you should report the matter to your Line Manager

Policy Implemented	Policy Review Date	Officer Responsible
August 2019	August 2022	CO/Board



# Dovecotes TMO Gifts and Hospitality Policy

## TMO Gifts and Hospitality Declaration Form

Employee/Committee Member Name:

Date:

Company / Client offering the gift:

Description of Gift / Hospitality:

Reason for Gift/ Hospitality:

Gift accepted yes / no (please circle)

Chief Officer Signature \_\_\_\_\_ Date: \_\_\_\_\_

Chairs Signature \_\_\_\_\_ Date: \_\_\_\_\_

Date: \_\_\_\_\_ (Please retain a copy of this form for your records)