



## **Gifts and Hospitality Policy**

### **Introduction**

The Restoration and Renewal Delivery Authority Limited ("Delivery Authority") accepts that directors, non-executive directors, employees, agency / interim workers, consultants and contractors may be offered gifts and / or hospitality from time to time. However, the Delivery Authority relies on the mutual trust and trustworthiness of those working within it and this procedure provides guidance on what to do when gifts or hospitality are offered. Any breach of this procedure could result in formal action in accordance with the Disciplinary Procedure, as employees may also risk being in breach of the Bribery Act 2010 (came into force from 2011).

### **Scope**

This procedure applies to all directors, non-executive directors, employees, agency/interim workers, consultants and contractors working with the Delivery Authority and is intended to prevent situations arising which could induce improper conduct, which could lead to bribery or a perception of improper influence.

Accordingly, this policy should be read in conjunction with the Delivery Authority's:

- Anti-Fraud and Bribery Policy
- Conflict of Interests Policy

Non-executive directors should comply with the requirements of this policy in connection with gifts or hospitality received in connection with their role as a non-executive director of the Delivery Authority.

### **Gifts and hospitality**

Those working for or on behalf of the Delivery Authority are not normally permitted to accept gifts or hospitality, or receive other benefits, which could be perceived as influencing their decision-making, creating a conflict of interest or having a detrimental effect on the reputation of the Delivery Authority, the Restoration and Renewal Programme or the two Houses of Parliament or related bodies.

The acceptance of gifts or hospitality may be permissible in exceptional circumstances, providing that advanced approval has been obtained from the relevant Line Manager, Head of Function or where applicable, Director. When accepting a gift or hospitality the recipient should consider the intention behind the offer, its value and timing and if it would stand up to public scrutiny. If rejecting a gift or hospitality may cause an offence, advice should be sought from the relevant Line Manager in the first instance.

The principles for registration of gifts and/or hospitality are:

- Any offer of gifts or hospitality that exceeds £25 requires authorisation from the Line Manager and must be registered, whether accepted or declined.
- If in doubt as to the value, the gift should be registered.



Registration is not required in the following situations:

- Gifts or hospitality received that are worth £25 or less do not need to be registered, providing it does not conflict with this policy and in aggregate the amount does not exceed £25 over a three-month period.
- Gifts or hospitality received as part of a committee or delegation visit do not have to be registered. However, personal gifts received on such visits should be registered as specified above. The standard rules regarding claiming expenses would apply as per the Expenses Policy.
- Free receptions, lunches or invitations to sporting or cultural events organised by external suppliers, potential suppliers, or contractors should be declined, except where there is a clear business advantage to accept and should be authorised in advance by the Head of Function.
- Attendance at events such as annual dinners of organisations may not be appropriate and must be authorised in advance by a Head of Function. The rules on registration apply as they do to gifts and hospitality.
- Internal working lunches or events requiring refreshments can be funded providing the appropriate approval has been obtained from the budget holder.
- Official gifts which bear the donor's name or insignia and which are retained by the Delivery Authority rather than the individual it was intended, do not need to be registered.

The principles for gifts or hospitality given or received from visitors to the Delivery Authority are:

- Gifts can be exchanged with visitors, providing the individual value does not exceed a cost of £25 and there is a justifiable reason for providing a gift that does not compromise the Delivery Authority.
- Hospitality in connection with core requirements of the Delivery Authority for external participants is permitted providing the value is proportionate and there is a direct link to a business objective.
- Only in certain circumstances can Directors authorise meals for official visitors. Authorisation must be given in advance and the number of Delivery Authority attendees should not exceed the number of visitors.
- It is appreciated that on such occasions, alcohol may be consumed, and the Director must again give advance approval. The budget for this may be delegated to the senior manager in attendance who will be permitted to claim any expenses incurred through the standard expense process.
- In relation to gifts and hospitality from potential suppliers or individuals: -

These should not be accepted from potential suppliers or individuals, who are competing to provide services to the Delivery Authority, which may be seen as an incentive relating to the potential contract.



## How to register gifts or hospitality

Each Head of Function shall keep a register of gifts and hospitality for their function. The General Counsel shall hold a central Register of Gifts and Hospitality.

Individuals are responsible for submitting any requests to their Line Manager for approval. Any responses must be copied to the Head of Function as they will be required to submit a quarterly report to the General Counsel.

## Review and publication of register

Entries in the Gifts & Hospitality Register will be regularly reviewed by the General Counsel and HR Director, where any potential issues will be raised with the Chief Executive or Chair of the Delivery Authority Board as appropriate. The Gifts & Hospitality Register will be published from time to time in the interests of transparency. This policy will continue to be reviewed in line with any changes in legislation or changes required to support the operational requirements of the Delivery Authority.

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