
Northern Lighthouse Board
BUSINESS GIFTS AND HOSPITALITY POLICY

POLICY STATEMENT

The Northern Lighthouse Board has a zero-tolerance to bribery and corruption. The Board's Anti-Bribery policy extends to all the Board's business dealings and transactions and these both have a wide interpretation across all functions. The Board's Anti-Bribery policy must be complied with, without exception.

The Commissioners of Northern Lighthouses fully support and comply with "the seven principles of public life". The Commissioners therefore do not advocate that giving and receiving gifts and hospitality is appropriate to the efficient conduct of their or the Board's business. There are, however, limited exceptions to this policy that if applied, must be carefully considered against these principles together with the Board's Anti-Bribery Policy that complies with The Bribery Act 2010. Extreme caution is necessary as gifts and hospitality may carry a risk of being used as a subterfuge for bribery and corruption. In giving or receiving gifts or hospitality this Policy and the requirements of the Board's Anti-Bribery Policy must be followed.

WHO IS COVERED BY THIS POLICY?

- All Commissioners and staff.

PROCEDURE

1. Any member of staff who is given or offered a gift or hospitality of any sort by a business contact (e.g. customer, supplier, etc - actual or potential) must be disclosed, immediately at the point of offer, the fact of the gift using the Gifts and Hospitality Form.
2. The Gifts and Hospitality Form is the process by which gifts are disclosed to Management including a review of the nature of the gift or hospitality and whether it should be accepted or not. Together the completed Forms combine to become the Gifts and Hospitality Register, which will be held by the Assistant to the Chief Executive.

Receipt of Gifts

1. Upon review of the Form, the Head of Function or relevant Director decides if the gift might constitute a bribe or other inducement and also decides whether it can be accepted or not, the employee will be required to give the gift to the Assistant to the Chief Executive, who will return it to the donor with a suitable covering letter.
2. Promotional gifts such as Company calendars, pens, diaries, chocolates etc which are under £10.00 in value, are not exempt from this policy, but can be accepted without approval, with the exception of alcohol which cannot be accepted, although must be disclosed using the Form. However, staff are reminded that, since such gifts are sent only to a limited number of employees, they should be distributed to other members of staff across the organisation.
3. Promotional gifts linked to procurement of goods, must be treated with extreme caution, as these are being offered as inducements to purchase and therefore the Board's Anti-Bribery Policy and procedures apply and a Form should be completed. No individual should benefit from such gifts and everything received must be entered into the Board's Staff Raffle.

Giving Gifts including the Board's promotional items and Offering Hospitality

1. While it is not the Board's policy to offer gifts or hospitality to clients, customers, etc. it is recognised that, on occasion, this may be necessary, for example when someone carries out work on a voluntary basis or for a nominal fee. Equally, it may be decided that a gift or hospitality would be appropriate if a service has been carried out in an exceptional manner.
2. In such a case, employees must complete the Form and pass this to the Assistant to the Chief Executive stating:
 - who the gift is for
 - why it should be given
 - the nature of the gift
 - its approximate value.
3. Only the Chief Executive can approve the giving of any gifts or offering of any hospitality and this approval must be given in writing using the Form in advance of any gift or hospitality being given.
4. Hospitality expenses must be carefully monitored by the Chief Executive and Managing Board including the processes by the Audit and Risk Committee.

Receiving Hospitality

As with gifts, the receipt of modest hospitality is an accepted courtesy of a business relationship. However, recipients should not allow themselves to be influenced or be perceived by others to have been influenced in making a business decision as a consequence of accepting hospitality. The frequency and scale of hospitality accepted should be managed openly and with care and should not be greater than the Board is able to reciprocate. You may not be aware of what is happening within other areas of the Board and your actions may impact on these, therefore extreme caution must be exercised.

Gifts and Hospitality Register Protocol

1. Each completed form becomes part of each financial year's Gifts and Hospitality Register, which is maintained and managed and held by the Assistant to the Chief Executive.
2. An electronic version of the Register must be created, maintained and managed to allow transparency and publication of the information in compliance with The Freedom of Information Act 2000 and publication on the Board's website.

Compliance

Failure to comply with any aspect of this policy will be treated as a disciplinary offence, which will be dealt with under the Board's formal disciplinary procedure.

Review Procedure

Adherence to the policy will be actively reviewed by Internal and External Audit and will be updated as required including but not limited to legislative changes.

Applicable Form

1. Gifts and Hospitality Form