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## **GIFTS AND HOSPITALITY (ANTI-BRIBERY) POLICY**

In general, Berryfields Parish Council (“the employer”) does not believe that it is appropriate for employees to accept gifts from clients, suppliers or any other person or organisation with which the employer has business connections. It is important to ensure that no employee acts in any way that is inconsistent with the Employer’s objectives or with the integrity of the business by accepting or giving a gift in a circumstance where it could influence, or be seen to influence, that employee’s business actions or decisions.

### **Guidance**

The Council’s Anti-Bribery procedures apply to all employees, as well as agency workers, consultants, and contractors.

Any employee who receives a gift of any kind from an existing or potential client or business contractor /supplier must disclose the fact of the gift, its nature and the identity of the sender to your Line Manager. A gift can include hospitality of any sort including tickets for an event. Unless the gift is anything other than a small token of appreciation having little substantial financial value (no more than £20), the employee will be required to return the gift to the sender with a polite note thanking him/her and explain that it is the Employer’s policy that employees should not receive gifts.

This policy does not apply to small promotional gifts with a value of £20 or less i.e. items such as stationery, calendars or pens that bear the logo or company name of another organisation or a bottle of wine or box of chocolates. However, once it is likely that such gifts will be received by only a limited number of employees, they are encouraged to share them with other members of staff where appropriate.

Under normal circumstances employees will not be authorised to give clients or other business contacts any form of hospitality or gifts without the knowledge of and express prior permission of their Line Manager.

### **Non-compliance**

Failure to comply with this policy may constitute a serious disciplinary matter as well as a breach of the Anti-Bribery legislation and the Employer reserves the right to take disciplinary action against employees where their actions are deemed to be in breach of this policy. Deliberate or reckless disregard of this policy may be treated as an act of gross misconduct and could lead to your dismissal.

Employees should also be aware that breach may also render you liable to criminal prosecution under the Anti-Bribery Act 2010.

The Council will not conduct business with third parties including clients, suppliers, agents or representatives who are not prepared to support its anti-bribery objectives.

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The Council depends on all employees, and those acting on its behalf, to assist in the prevention of bribery. Therefore, all employees and others acting for, or on behalf of, the Council are expected to report any suspected bribery to the Council following the Council's Whistle Blowing procedures. All employees will receive the support of the Council if they report of suspected bribery in good faith even if, following an investigation, it is found that no bribery took place.

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**Document History**

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