

Policy on Gifts and Hospitality

Purpose

1. The purpose of this Policy is to set out the responsibilities of colleagues within the Legal Services Board (**'the LSB'**) in respect of offering or receiving corporate gifts and/or hospitality.

Scope

2. This Policy applies to Board Members, full time and part time employees on full or short-term contracts, and to others working with the LSB, including secondees, agency contractors and others employed under a contract of service (hereafter collectively referred to as **'colleagues'**).

General Principles

3. Colleagues generally will not be in a situation that requires them to offer or to receive corporate gifts and/or hospitality. However, these guidelines are intended to assist colleagues:
 - a) to act with propriety;
 - b) to avoid any conflict of interest with their LSB duties and private interests; and
 - c) to know what they may and may not offer or receive.
4. Hospitality may take various forms, from the provision of tea and coffee at meetings attended by colleagues, to large formal receptions or dinners. The same general principles apply in every case.
5. However, when colleagues do offer or receive corporate gifts and/or hospitality, they must not do anything that might undermine, or be reasonably thought to undermine, the independence or impartiality of the LSB.
 - Colleagues and their families should refuse to accept corporate gifts and/or hospitality that could influence, or be reasonably thought to influence, the professional advice and/or decisions of LSB colleagues or that could, or be reasonably thought to place, them under an obligation to the donor, compromise their impartiality or otherwise be improper.
 - If a corporate gift is to be refused, this should be done politely and with an explanation that colleagues are not permitted to receive gifts or hospitality of the value offered. Unsolicited gifts should be returned with an explanation of LSB policy, except where refusal would clearly cause misunderstanding or offence. In this case, the gift should only be accepted after consultation with the Board Secretary and a letter should be sent saying that the gift has been accepted on behalf of LSB, not by the individual.
 - The offering or receipt of small corporate gifts (under £25) and/or hospitality is acceptable within reasonable grounds, provided that it is a normal and appropriate expression of business courtesy. It is the responsibility of colleagues to decide if the corporate gift and/or hospitality is conventional and normal and reasonable in the circumstances. If in doubt, colleagues should consult the Board Secretary.

- Under no circumstances should colleagues enter into reciprocal entertaining arrangements.
6. The following principles apply to invitations from external organisations to functions:
- Event-based hospitality that allows colleagues to meet stakeholders, and so which might shape or promote the LSB's work, is generally acceptable. For example, going to an industry awards dinner where it is important that a representative of the LSB is present.
 - Work-related hospitality from a single stakeholder is acceptable, provided that it can clearly be seen to be of value to LSB's work. For example, working lunches or dinners.
 - A colleague should avoid corporate hospitality that benefits him / her personally if it is difficult to justify as being of benefit to the LSB, or if there is potential for embarrassing the LSB. For example, tickets to sporting events or the theatre.

Gift and hospitality register

7. All offered or received corporate gifts and/or hospitality with a value on the open market of approximately £10 or above must be reported as soon as possible to the Board Secretary, who will record the gift and/or hospitality on LSB's published Gifts and Hospitality Register.
8. Gifts of more than £10 and up to £25 may be retained, subject to the consent of the Chief Executive (who will advise the Board Secretary).
9. Corporate hospitality includes working lunches etc at the offices of other organisations. Working lunches etc provided at LSB premises or by the LSB at LSB events need not be reported or registered.
10. The report of the corporate hospitality must include the name of each person attending and the reason for the hospitality. The LSB may require this information to prove that no tax is payable.

Approved by the Board on 29 June 2010.