

Witham Town Council: Registration of Gifts & Hospitality Policy

Policy Overview

This policy explains the protocol in which officers of the Town Council shall register any gifts or hospitality offered. Its purpose is to protect officers and the Council from any suggestion of improper influence, bribery or conflict of interest, and to promote openness, integrity and accountability in line with the Seven Principles of Public Life (the Nolan Principles).

This policy applies to all employees of Witham Town Council, including permanent, temporary, casual and agency staff, and to any other individuals working for the Council under a contract for services.

Guidance on Declaring Gifts and Hospitality

All officers at Witham Town Council must register any gifts, favours, rewards or hospitality offered or given to them over the value of £25. A form for registering gifts and hospitality is attached to this policy and can also be downloaded from the shared files. Once completed the form should be given to the Town Clerk who will make a decision on whether the gift or hospitality can be accepted.

Officers are also encouraged, as good practice, to record any offer which may present a perception risk, even if the estimated value is £25 or less, particularly where: the offer comes from a current or potential contractor, supplier, applicant, licensee or other party with whom the Council has, or may have, a regulatory or financial relationship; or multiple low-value offers are made by the same source over time.

Offers of gifts or hospitality must be treated with caution whenever any suggestion of improper influence could arise. To prevent any improper behaviour or suggestion of improper behaviour arising, employees must take great care when a gift or hospitality is offered. Under no circumstances should you accept gifts or hospitality which are extravagant nor those given by the same client or individual on a frequent basis.

As a guiding principle, officers should not accept any gift or hospitality which could reasonably be perceived as placing them under any obligation, influencing their decisions or compromising their impartiality. When in doubt, officers should politely decline and seek advice from the Town Clerk before accepting.

Any employee accepting/offering money for doing or not doing anything or showing favour or disfavour to any person in their official capacity shall be subject to immediate dismissal. Such conduct may also constitute a criminal offence under bribery or corruption legislation and may be reported to the relevant authorities.

Transparency and the register

All declared offers (whether accepted or declined) above the £25 threshold must be recorded in the Council's Gifts & Hospitality Register, which will be maintained by the Town Clerk (or nominated officer). The register will be reviewed periodically by senior management and may be reported to the Policy & Resources Committee as appropriate.

Entries in the register should clearly state the name and organisation of the donor, description of the gift or hospitality, estimated value, date of offer/receipt, whether accepted or declined, and the reason for the decision.

Special Dispensation

Employees should only accept/give offers of gifts or hospitality if there is a genuine need to impart information or represent Witham Town Council in the community and must comply with the provisions below:

- Employees shall be allowed to receive books, diaries, pens, pencils, and similar articles that would have also been sent to a large number of other companies, such as a promotional calendar at Christmas.
- Working lunches are permissible provided that the employee has the approval of the Town Clerk.
- Employees may receive gifts on behalf of Witham Town Council from visiting dignitaries but must then declare these using the Officers' Declaration of Gifts and Hospitality form. The decision as to whether the employee can personally retain the gift will be made by the Town Clerk.
- Any such other matters as the Town Clerk may approve from time to time.

Employees must still register the receipt/offer of any gift or hospitality above a value of £25 even if it is included in the list above. Employees are personally responsible for their actions in connection with any offer of a gift, favour, reward or hospitality and the completion of the register does not relieve them of the responsibility to justify their acceptance of such an offer.

Breaches of this duty will be taken very seriously and may result in disciplinary action.

In particular, officers must not:

- accept gifts or hospitality where the Council is in, or may be perceived to be in, a contractual, regulatory, enforcement or decision-making relationship with the provider and acceptance could reasonably be seen as influencing the outcome;
- solicit gifts, hospitality or other benefits for themselves or others;
- accept repeated or lavish hospitality from the same source;
- accept gifts or hospitality in a personal capacity that are clearly connected with their official duties and which could not reasonably have been offered if they were not a Council officer.

Refusal of gifts and hospitality

Where an offer of a gift or hospitality is refused, the officer should still complete the declaration form and indicate that it was declined. This helps demonstrate transparency and protects both the officer and the Council from any allegation of impropriety.

Publication and access

As good practice, the Council may publish summary information from the Gifts & Hospitality Register (for example, on its website) to promote openness and public confidence, subject to data protection requirements.

Agreed at Minute 58(e) of Policy & Resources Meeting held 29.3.2022

Reviewed: 9th March 2026 by Town Council

Review Date: March 2028

POLICY NO: WTC/004 - POLICY & RESOURCES

Witham Town Council | 61 Newland Street | Witham | Essex | CM8 2FE

Officers Declaration of Gifts or Hospitality

Staff Name	
Date	
Particulars of how Offer or Receipt of Gift or Hospitality Arose	
View of Town Clerk	
Approval <i>Given/Denied</i>	
Staff Signature and Date	
Town Clerk: Signature and Date	