



**Information Governance Team**

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Dear Sir/Madam

**Freedom of Information Act 2000 (FOIA)  
Request ID: FOI667920118**

Thank you for your request for information relating to Gifts and Entertainment Policy.

You have requested the following information:

**1. Please provide a copy of any gifts and entertainment policy relevant to employees and elected members.**

Please see attached a copy of the Gifts and Hospitality Policy for officers.

Coventry City Council's Code of Conduct for Elected Members includes the framework required for Councillors relating to gifts and hospitality. The Code of Conduct is published on the Council's website, see section 17 of Part 4A in the attached link:

<https://edemocracy.coventry.gov.uk/documents/s61585/Part%204%20-%20Codes%20and%20Protocols%20April%202024.pdf>

We are therefore not required to disclose the information as per Section 21 of the Act.

The supply of information in response to a FOI/EIR request does not confer an automatic right to re-use the information. You can use any information supplied for the purposes of private study and non-commercial research without requiring further permission. Similarly, information supplied can also be re-used for the purposes of news reporting. An exception to this is photographs. Please contact us if you wish to use the information for any other purpose.

For information, we publish a variety of information such as: [FOI/EIR Disclosure Log](#), [Publication](#)

[Scheme](#), [Facts about Coventry](#) and [Open Data](#) that you may find of useful if you are looking for information in the future.

If you are unhappy with the handling of your request, you can ask us to review our response. Requests for reviews should be submitted within 40 days of the date of receipt of our response to your original request – email: [infogov@coventry.gov.uk](mailto:infogov@coventry.gov.uk)

If you are unhappy with the outcome of our review, you can write to the Information Commissioner, who can be contacted at: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF or email [icocasework@ico.org.uk](mailto:icocasework@ico.org.uk).

Please remember to quote the reference number above in your response.

Yours faithfully

**Information Governance**



# Gifts and hospitality - Print version

Procedures for recording gifts and hospitality.

- Gifts and hospitality form for Officers [<https://intranet.coventry.gov.uk/downloads/file/154/gifts-and-hospitality-form-for-officers>]
- Constitution - part 4 [<https://edemocracy.coventry.gov.uk/documents/s61585/Part 4 - Codes and Protocols April 2024.pdf>]

See also:

- Gifts and hospitality for Members [<https://intranet.coventry.gov.uk/members/guidance-forms-members>]

## Gifts and Hospitality Policy

- 1.1 Coventry City Council is funded almost entirely from public funds and it is essential that the Council can demonstrate the highest standards of probity in general, and specifically in relation to its dealings with third parties.
- 1.2 The aim of the policy is to ensure transparency in the activities of the Council and consequently protect employees from accusations of misconduct. All employees are required to familiarise themselves and comply with this procedure, including any future updates that may be issued from time to time by the Council.

## 2. Bribery and Corruption

- 2.1 The Local Government Act 1972 makes it an offence for employees to accept any fee or reward (including gifts) for their employment other than proper pay. On conviction employees are liable to be fined.
- 2.2 There is a responsibility, organisationally and individually, to adhere to the provisions of the Bribery Act 2010. Where there are significant breaches of the Act, the penalties for the organisation, senior officers, employees or associated parties are severe, with up to ten years imprisonment for individuals or unlimited fines. The Act makes it an offence to offer or give a



bribe and to request, agree to, or accept a bribe. Whilst a bribe may take the form of a gift of cash or other item, it can also include hospitality where it is intended to improperly influence another's behaviour. However, the Act does not prohibit reasonable and proportionate hospitality intended for legitimate purposes.

## 3. Gifts

- 3.1 You must not accept gifts, irrespective of estimated value, which could give rise to real or substantive personal gain or a reasonable suspicion of influence on your part to show favour from persons seeking to acquire, develop or do business with the local authority or from persons who may apply to the local authority for any permission, license or other significant advantage. Cash must never be accepted.
- 3.2 You should treat all offers of gifts with caution, and always politely refuse such offers, however small or modest, where they might reasonably be interpreted by someone else as being, a reward or favour for giving preferential treatment or as a condition of providing a service capable of influencing any decision which you or the Council may make now or in the future. So, for example, you should not allow a service user or other person to gain the impression that any form of gift is expected or anticipated as part of delivering a service to them, or that this will in any way influence any decisions that are taken in respect of that service.
- 3.3 If refusal would cause needless offence and the person is not seeking a business decision; or if a gift has been delivered and cannot be returned you should record these on the registrar. In these circumstances larger gifts that are more than a token gift should be disposed of to charity.
- 3.4 You should register any gift with an estimated value of at least £50 within 28 days of its receipt that has been received or offered and refused. Gifts and hospitality form for officers [<https://intranet.coventry.gov.uk/downloads/file/154/gifts-and-hospitality-form-for-officers>].
- 3.5 Any offer of a gift during a tender process must be reported to the Deputy Chief Executive or relevant Director.

## 4. Hospitality

- 4.1 It is of vital importance that the possibility of an employee being deemed by others to have been influenced in making a business decision, as a result of accepting hospitality, should be avoided both for the employee's own protection and for the protection of the City Council. You must not accept hospitality, irrespective of estimated value, which could give rise to a reasonable suspicion of influence on your part to show favour from persons seeking to acquire, develop or do business with the local authority or from persons who may apply to the local authority for any permission, license or other significant advantage.

- 4.2 You may accept incidental hospitality, such as light refreshments, working lunch or other meals, which is part of a visit, conference, meeting or promotional exercise. There is no requirement to register receipt in these circumstances.
- 4.3 You should register any hospitality with an estimated value of at least £50 within 28 days of its receipt that has been received or offered and refused. Gifts and hospitality form for officers [<https://intranet.coventry.gov.uk/downloads/file/154/gifts-and-hospitality-form-for-officers>].
- 4.4 Any offer of hospitality during a tender process must be reported to the Deputy Chief Executive or relevant Director.
- 4.5 To reflect principles of agile working, it may on occasion be appropriate to hold meetings with third parties outside of main Council buildings. In such circumstances, where it is conducive to the conduct of the meeting, officers may offer hospitality (not including alcohol) without prior approval from their line manager. The value of such hospitality must not exceed the Council's standard rates for subsistence and transactions will be subject to post event authorisation through the Council's standard payment mechanisms. All transactions relating to hospitality must be clearly annotated as such when transactions are processed.
- 4.6 It is recognised that, on occasions, the business of the City Council can be progressed through, for example, working lunches or dinners with external individuals, businesses or groups. Such examples could be received or given as hospitality. As a general rule, an employee should only provide or accept offers of such hospitality if there is a genuine need to impart information or there is a benefit to the City Council or the City in representing the authority.

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