

Gift and Hospitality Policy

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LTE Group – Gifts and Hospitality Policy

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The giving or receiving of gifts or hospitality by any colleague or associated persons of LTE Group **must** be in line with LTE Group's values and ethical standards, and **must** be able to stand up to internal and public scrutiny.

Any overt or covert offer of any gift or hospitality (or other inducement) that might give rise to accusations of impropriety **should be immediately reported to the Anti-Bribery Officer**.

This policy contains comprehensive guidance on which instances it would be appropriate to give or receive gifts or hospitality and which instances it would not. However, this policy cannot cover every eventuality, and must be interpreted by applying a 'reasonable and proportionate' test to the particular circumstances of each case.

If, after referring to this policy, colleagues are unsure about whether to receive or offer gifts and hospitality, or have any suspicions in relation to gifts and hospitality proposed to be offered or received, **the Anti-Bribery Officer should be contacted for advice**.

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Purposes of Gifts and Hospitality Policy

The purpose of this policy is to ensure that conduct in relation to gifts and hospitality is compliant with the Bribery Act 2010, by:

- making all colleagues and the Board of Governors aware of the risks of improper conduct in relation to gifts and hospitality, and to outline what their responsibilities are with regard to observing and upholding the Group's position;
- setting out the principles and practicalities that all colleagues and the Board of Governors should consider when giving or receiving gifts or hospitality on behalf of LTE Group; and
- supporting colleagues and the Board of Governors to maintain high standards of propriety and professionalism.

Compliance with this policy will help to protect individuals from accusations of impropriety.

This policy **does not** cover:

- gifts or hospitality which LTE Group offers to its own staff or Board of Governors;
- gifts or hospitality given or received by colleagues or the Board of Governors on a personal basis, and unconnected to their employment or role within LTE Group;
- sponsorship (see Anti-Bribery and Corruption Policy); or
- donations (see Anti-Bribery and Corruption Policy).

Policy Scope

This policy applies to all colleagues, and associated persons of LTE Group (both internal and external to the organisation), regardless of position held.

Where applicable this includes (but is not limited to):

- Members of the LTE Group Board
- All Employees (including those employed by subsidiary companies)
- Agency Colleagues
- Contractors (including MOL Associates)
- Consultants
- Suppliers
- Service Users (including learners, students, apprentices, working professionals and offenders)
- Employees and committee members of organisations funded by the organisation
- Employees and principals of partner organisations

Third parties will be bound by any contractual obligations relating to Anti-bribery, as set out in contracts and agreements.

This policy is operated in conjunction with the **Financial Regulations** and other related LTE Group policies and procedures, including the **Public Interest Disclosure and Whistleblowing Policy**, the **Counter-Fraud Policy and Fraud Response Plan**, the **Anti-Money Laundering policy** and the **Anti-Bribery and Corruption Policy**.

Background

The LTE Group Anti-Bribery and Corruption Policy is the foundation of the Gifts and Hospitality Policy, and the two should be read in close conjunction.

Under the provisions of the Bribery Act 2010, the inappropriate giving or receiving of gifts or hospitality may leave individuals open to charges of bribery.

Bribery does not have to involve cash or an actual payment exchanging hands and can take many forms such as a gift, lavish treatment during a business trip or tickets to an event.

However, in business, there are many instances of giving or receiving reasonable and proportionate gifts or hospitality that are **not** aimed at influencing performance or decision-making, and therefore remain outside the scope of the Act.

Organisations may offer, or accept, reasonable and proportionate gifts and corporate hospitality with the aim to build and strengthen working relationships. If there is no risk that the motivation behind the giving of the gift or hospitality could be misconstrued, this is deemed to an accepted business practice and is acceptable within the limits defined in this policy.

It is only when such gifts or hospitality become increasingly lavish or excessive or coincide with, for example, the letting of a major contract, a line can be crossed which takes the practice into the realm of bribery and corruption. Any gift or offer of hospitality should therefore pass a 'reasonable and proportionate' test before it is considered for acceptance.

Gifts and Hospitality: Definitions and Examples

Gifts

In the context of this policy, a 'gift' can be defined a tangible item or other benefit that is offered to an individual/organisation by another individual or organisation, for which no reasonable fee is paid in return by the recipient.

Gifts may range from token gifts of little value, such as flowers, confectionery, business and branded stationery, and other promotional items, to a substantial gift of higher value, such as an expensive pen.

Hospitality

'Hospitality' can be more difficult to define than 'gift'. However, in the context of this policy it could include the offer of lunches, dinners, accommodation or entertainment, for which no reasonable fee is paid in return by the recipient.

Hospitality can range from token hospitality of little value, such as providing food and drink (e.g. a working lunch), to high value activities, such as a ticket and entertainment for a sporting event or concert.

In some instances, gifts and hospitality may be combined, for example a commemorative item may be provided as a gift as part of a hospitality event.

Family Member: Definition and Examples

In the context of this policy, the term a 'family member' should be given a very wide meaning. It includes a partner (someone you are married to, your civil partner, or someone you live with, in a similar capacity), a parent, a parent-in-law, a son or daughter, a stepson or stepdaughter, the child of a partner, a brother or sister, a brother or sister of your partner, a grandparent, a grandchild, an uncle or aunt, a nephew or niece, and the partners of any of these people.

Statement of Responsibility – LTE Group Board

At the end of each year, LTE Group Board **must** be able to provide assurance and produce evidence that, as far as they are aware, all relevant gifts and hospitality have been recorded and that the LTE Group Gift and Hospitality Policy has been complied with.

The **Chair of the Board of Governors** is responsible for:

- approving or rejecting any 'Request for Approval to Offer or Accept a Gift' applications made by the Chief Executive Officer; and
- approving or rejecting 'Request for Approval to Host or Attend an Event' applications made by the Chief Executive Officer.

Statement of responsibility – Audit and Risk Committee

The Audit and Risk Committee are responsible for:

- annually reviewing all the gift and hospitality declarations made on the Gifts and Hospitality Register; and
- for reporting to the LTE Board on whether or not, as far as they are aware, all relevant gifts and hospitality have been recorded and that the LTE Group Gift and Hospitality Policy has been complied with.

Statement of Responsibility – Chief Executive Officer

The Chief Executive Officer is responsible for:

- appointing an Anti-Bribery Officer;

- approving or rejecting 'Request for Approval to Offer or Accept a Gift' applications; and
- approving or rejecting 'Request for Approval to Host or Attend an Event' applications.

Statement of Responsibility – Anti-Bribery Officer

The Chief Executive Officer has designated the Chief Financial Officer to be the **Anti-Bribery Officer**.

The Anti-Bribery Officer is responsible for ensuring that LTE Group is compliant with the Bribery Act 2010, and is therefore responsible for:

- ensuring that this policy is implemented and maintained;
- providing additional advice and guidance, as and when required;
- seeking assurance from the senior leadership group that this policy is being enforced in their areas and that the required declarations of gifts and hospitality are being made;
- performing a first review of any 'Request for Approval to Offer or Accept a Gift' applications, and then for forwarding them on to the Chief Executive Officer for final review;
- performing a first review of any 'Request for Approval to Host or Attend an Event' applications, and then for forwarding them on to the Chief Executive Officer for final review;
- annually reporting all the gift and hospitality declarations made on the Gifts and Hospitality Register to the Audit and Risk Committee; and
- keeping this policy under review and suggesting any changes required to the Audit and Risk Committee.

Statement of Responsibility – All Colleagues and Governors of the Board

All LTE Group colleagues and Governors of the Board are responsible for:

- complying with this policy, and ensuring that their interests, activities and behaviours do not conflict with these obligations;
- completing all mandatory anti-bribery training;
- remaining alert and vigilant to the risk of bribery and corruption;
- obtaining the required level of approval, where necessary (and in line with the limits set in this policy), **before** accepting a gift or hospitality; and
- for declaring and, if necessary, surrendering, any gifts or hospitality* that they are offered** or give in the course of performing their role at LTE Group.

* This includes and gifts or hospitality offered to, or given by, their family members.

** A declaration should be made regardless of whether the gift or hospitality is accepted or declined.

Roles at Higher Risk of being a Bribery Target

The roles within LTE Group that are at a higher risk of being a **prime target for bribery** include:

- those in a senior position, who are viewed as holding a 'position of influence'; and
- those who play a part in the procurement process, whether it be those who are responsible for researching prices, those who order goods and services, or those who have the authority to sign-off on purchase orders or payments to suppliers.

Breach of Policy - Sanctions

To act as a deterrent to others, a main objective in any investigation of allegations of bribery or corruption will be the punishment of the perpetrators.

The acceptance or the offering of a bribe is considered to be an example of gross misconduct.

LTE Group will take firm action against any identified breaches of this policy by LTE Group colleagues. Depending upon the nature and severity of the breach, this is likely to include disciplinary action.

Gifts and Hospitality: Guiding Principles

LTE Group has a **zero-tolerance stance on bribery and corruption**, and requires all colleagues, students, Board members and any other associated persons to act, at all times, honestly and with integrity.

LTE Group **will not tolerate** any accepting or giving of gifts or hospitality that contravenes the Bribery Act 2010. Therefore, colleagues and the Board of Governors must be cautious about accepting or giving gifts that could give grounds for accusations of impropriety and suggestions of undue influence.

During their dealings with other organisations, colleagues and the Board of Governors may be offered gifts or hospitality where the intention of the person making the offer is not fully clear. This could place individuals in a difficult position: where refusal may cause misunderstanding or offence; but to accept may give rise to questions of impropriety or conflicts of interest.

A gift or hospitality should **only** be accepted if the person to whom the offer is made is satisfied that:

- the offer has been made for a proper purpose, and that is associated with official LTE Group business;

- the gift or hospitality has been given openly, and will be received and acknowledged openly, without any degree of secrecy attached;
- acceptance is consistent with the ethical framework in which LTE Group operates, as detailed in the 'Statement of Commitment to Ethical Behaviour' in the Anti-Bribery and Corruption Policy.
- the offer is appropriate and its value is reasonable and proportionate to the circumstances;
- acceptance accords with all applicable LTE Group policies and governmental legislation;
- acceptance does not constitute an actual or perceived conflict of interest;
- acceptance does not create a specific or general obligation which LTE Group is required to fulfil; and
- acceptance does not constitute an actual or perceived inducement in respect of a decision the individual or LTE Group is responsible for, including academic assessment.

The person to whom the offer of a gift or hospitality has been made should also always consider what might be the public perception of LTE Group receiving such a gift or hospitality.

Would an average member of the general public think that the gift or hospitality might influence the decision-making and/or actions of LTE Group? If the answer is yes, the gift or hospitality should be politely refused.

It is recognised that, in some instances, there may be an element of judgement required in reaching a decision. If, after referring to this policy, colleagues are unsure about whether to receive or offer gifts and hospitality, or have any suspicions in relation to gifts and hospitality proposed to be offered or received, **the Anti-Bribery Officer should be contacted for advice.**

Guidance on the Refusal of Gifts or Hospitality

It is recognised that, in some instances, refusal of gifts or hospitality could cause embarrassment to both parties.

Refusals should always be courteous but firm, and the person refusing the gift or hospitality should make the other party aware of this LTE Group Gifts and Hospitality Policy. Where the context of the offer makes refusal impossible (for example, where the offer is part of a ceremony, or where refusal would be damaging to LTE Group's relationship with a non-commercial organisation), **advice on the appropriate response should be promptly sought from the Anti-Bribery Officer.**

Post-Acceptance: Conflict of Interest Revealed

In some rare instances, a gift or hospitality may be accepted in good faith, and it is not until afterwards that it becomes clear that the acceptance has caused a conflict of interest (actual or perceived) in respect of a decision that LTE Group must make.

If this happens, the colleague or Governor who has received the gift or hospitality should **immediately declare this to the Anti-Bribery Officer** and remove themselves from the decision-making process.

Principles of Gift Acceptance and Refusal

Gifts are categorised based on their value. In most circumstances, this will need to be estimated based on the rough market value of equivalent goods.

When estimating the value of a gift, you should consider **all gifts received from one person or organisation over a reasonable** timescale as a single gift. For example, if, over a 12 months period you receive five items each worth £5, you should consider them as a single gift worth £25.

The appropriate actions for each category of gift are as follows:

Estimated Value	Examples	Approval Required	Declaration Required	Retain or Surrender
Little or no intrinsic value - less than £5	E.G. confectionery, business and branded stationery (pens, calendars etc.) or other promotional items.	No	No	Retain
Between £5 and £25	E.G. given in gratitude or to mark an occasion, such as a book, alcohol, flowers or foodstuffs.	No	Yes	Retain
High value – between £25 and £50	E.G. ornaments, clothing, jewellery, expensive pens, or electronic equipment.	No	Yes	Retain
High value - more than £50		Yes	Yes	Surrender
Monetary gift - of any value*	E.G. cash or redeemable vouchers.	Prohibited	Yes	Propose alternative – see below

* The offer of a monetary gift of any value **must not** be accepted. Please see below for suggested alternative action.

High value – between £25 - £50

Any gifts with an estimated value of more than £25 (whether accepted or declined) **must** be recorded in the Gifts and Hospitality Register – **please see Appendix 1 - Gift and Hospitality Declarations Procedure and Guidance Notes**. This declaration **should** be made within 5 working days of receiving the gift.

Although gifts with a value between £5 and £50 can be personally retained, the recipient may decide that it would be more appropriate to raffle the item, or share it with the wider team. If a gift is raffled, the raffle tickets should be made available to all colleagues, and the proceeds donated to charity.

High value – more than £50

Any gifts with an estimated value of more than £50 should be treated **with caution**, and only be accepted on behalf of LTE Group (and not as an individual).

If a colleague or a Governor of the Board does feel that it would be appropriate to accept the gift on behalf of LTE Group, then a 'Request for Approval to Offer or Accept a Gift' application should be

made - **please see Appendix 2 - 'Request for Approval to Offer or Accept a Gift' Procedure and Guidance Notes.**

The gift **must** then be surrendered to the Anti-Bribery Officer, who will make suitable arrangements for either:

- its use for charitable purposes; or
- its use within The LTE Group; or
- for its disposal.

Value of gift – change in estimation

In some instances, the recipient of a gift may come to realise that the value of the gift is higher than the original estimate and should not have been accepted. In circumstances such as this, if practical, the gift should be returned with an explanation, and **the Anti-Bribery Officer should be informed.**

Gifts from students

A gift given by a student may be perceived as being given in order to influence assessment decisions. Therefore, a gift from a student should be treated **with caution**, and only accepted if it is deemed to be a low value thank you gift.

Monetary Gifts (Prohibited) – Suggested Alternative Action

The offer of a monetary gift (including redeemable vouchers) of any value **must not** be accepted. The offered should be declined, and immediately recorded on the Gifts and Hospitality register – **please see Appendix 1 - Gift and Hospitality Declarations Procedure and Guidance Notes.**

However, if appropriate, it could be suggested to the person offering the gift that they may instead wish to donate to **The Cecil White Prize Fund** (The LTE Groups' Student Prize Fund).

If the person offering the gift does choose to take this alternative course of action, **the Anti-Bribery Officer should be informed**, who can advise on how the donor can make their payment.

Principles of Hospitality Acceptance and Refusal

In business, there are many instances of giving or receiving hospitality that are reasonable and proportionate, and made with the aim to build and strengthen working relationships.

Hospitality that is proportionate, for a clear business purpose and does not create a conflict of interest **can be accepted**, in line with the guiding principles given in this policy.

However, when assessing whether or not an offer of hospitality should be accepted, the following should be considered:

Principle	Questions to Ask
Purpose	Is the hospitality in the interests of LTE Group and does it further LTE Group's objectives?
	Is there a genuine business reason to accept the hospitality?
Proportionality	<p>How frequent has this person or organisation made an offer of hospitality to LTE Group?</p> <p>Hospitality should not be over-frequent from the same source, as this could create the perception that a person or organisation is trying to influence LTE Group.</p>
	<p>How generous is the hospitality?</p> <p>Hospitality should also not be over-generous, either because it is particularly lavish, or because it is disproportionate to the relationship between the LTE Group and the person or organisation.</p>
	Is the level of hospitality comparable to the level that LTE Group would offer to regulated companies, organisations, professional advisors, and other parties and stakeholders (including suppliers and potential suppliers)?
Conflict of interest	<p>What is the relationship between LTE Group as a whole and the person or organisation offering the hospitality?</p> <p>If LTE Group is considering entering in to a contract with the organisation, the offer of hospitality must not be accepted (unless it is clearly trivial, e.g. hot drinks and biscuits at a business meeting).</p>

Hospitality which is disproportionate, without a clear business purpose or may create a conflict of interest **must be refused**. However, the offer of hospitality should still be recorded in the Gifts and Hospitality Register – **please see Appendix 1 - Gift and Hospitality Declarations Procedure and Guidance Notes**.

Often, offers of hospitality are made in advance of the event in question. Therefore, if in doubt, **guidance should be sought from the Anti-Bribery Officer**.

The following table lists the appropriate actions for each category of common types of hospitality, as follows:

Type of Hospitality	Venue	Approval Required	Declaration Required
Hot and cold drinks, biscuits, cakes or other snacks	Any third party's office or premises	No	No
Working breakfast or lunch	Any third party's office or premises		
Working breakfast or formal lunch	Restaurant (or other venue) away from third party's office or premises		
Drinks reception, or similar networking event	Any venue		
An evening meal	Any venue	No	Yes
Expensive and exclusive hospitality (see below)	Any venue	Yes	Yes

If a declaration is required, this **should** be made within 5 working days of receiving the hospitality.

Expensive or Exclusive Hospitality

There is no comprehensive definition of what constitutes expensive or exclusive hospitality, but it would include invitations to major sporting or cultural events. This would be particularly so if the offer is made to only a small number of people.

Accepting expensive or exclusive hospitality could very easily be **perceived negatively** by our stakeholders or by the press.

Therefore, the **default position should be to politely refuse** such an invite (even if the event is taking place on a date and time that is not normally part of the individual's working hours), **unless** the individual feels that, by attending, they would increase their effectiveness in discharging their role or otherwise furthering LTE Group's interests.

If a colleague or a Governor of the Board does feel that it would be appropriate to accept the invite, then a 'Request for Approval to Host or Attend an Event' application should be made - **please see Appendix 3 - 'Request for Approval to Host or Attend an Event' Procedure and Guidance Notes.**

Regardless of whether the offer of hospitality is accepted or declined, it should still be recorded in the Gifts and Hospitality Register – **please see Appendix 1 - Gift and Hospitality Declarations Procedure and Guidance Notes.**

Overseas Visits

When making overseas visits, colleagues or Governors of the Board may be offered gifts or hospitality that, under normal circumstances, would be viewed as expensive or exclusive.

However, in a country where this would be in line with local customs, in order not to cause offence, it may be deemed necessary to accept this level of hospitality from a host. If this situation is likely to

arise, the colleague or Governor of the Board should **seek advice from the Anti-Bribery Officer before the trip**, as to what would (and would not) be acceptable. *

In some instances, a situation may arise where a colleague or Governor of the Board is already overseas and excessive hospitality or gifts are offered, which it would cause offence to refuse.

If this is the case, the recipient should ensure that a Gift and Hospitality Declaration is made immediately on their return to the UK, and **any gifts received surrendered immediately to the Anti-Bribery Officer**.

* **Please note:** as in the UK, the offer of a monetary gift (including redeemable vouchers) of any value **must not** be accepted.

Attending a Conference as a Speaker

It is **not** the policy of The LTE Group to charge a fee for providing a speaker at a dinner or conference. It should always therefore be made clear to the conference organiser that no payment is required or expected.

The same principles of Gift and Hospitality Acceptance and Refusal (as outlined in the relevant sections above) apply to all offers of gifts and/or hospitality made to a colleague or a Governor of the Board who is asked to give a speech on behalf of LTE Group.

If it has been agreed that a colleague or a Governor of the Board can accept an invitation to give a speech, or provide input to a conference, then it is deemed acceptable for a third party to meet some or all of the travel and/or accommodation costs. This applies whether or not the colleague or Governor of the Board would otherwise be attending the event as a delegate.

On the understanding that the travel and accommodation arrangements have been undertaken in advance, the reimbursement of costs by a third party must be made payable to LTE Group.

Principles of Giving Gifts and Hospitality

In business, there are many instances of giving or receiving a gift or hospitality that are reasonable and proportionate, and made with the aim to build and strengthen working relationships.

A gift or offer of hospitality that is proportionate, for a clear business purpose and does not create a conflict of interest **can be given**, in line with the guiding principles given in this policy.

However, **unless** the gift or hospitality is of little or no intrinsic value, colleagues and Governors of the Board should **exercise caution** when making an offer to a third party.

Colleagues and the Governors of the Board may only offer a gift where:

- the offer is made for a proper purpose* associated with official LTE Group business;
- the gift or hospitality has been offered openly, and will be received and acknowledged openly, without any degree of secrecy attached;

- the offer is consistent with the ethical framework in which LTE Group operates, as detailed in the ‘Statement of Commitment to Ethical Behaviour’ in the Anti-Bribery and Corruption Policy.
- the offer is appropriate and its value is reasonable and proportionate to the circumstances;
- the offer accords with all applicable LTE Group policies and governmental legislation;
- the offer is not made to influence or be perceived to influence an individual or organisation or to gain any advantage; and
- the offer made does not constitute an actual or perceived conflict of interest.

*** Offer of a gift or hospitality – proper purpose**

The offer of a gift or hospitality by a colleague or Governor of the Board would only be deemed to have a proper purpose when it is:

- to promote the values and reputation of LTE Group for academic, professional or charitable purposes; or
- to aid the establishment and maintenance of academic, collaborative, professional or business relationships with partners and supporters of LTE Group; or
- to provide a small token of thanks to associates or supporters for their contribution to the work of the LTE Group.

Gift Giving - Approval and Declaration Limits

Estimated Value	Examples	Approval Required	Declaration Required
Little or no intrinsic value - less than £5	E.G. confectionery, business and branded stationery (pens, calendars etc.) or other promotional items.	No	No
Between £5 and £25	E.G. given in gratitude or to mark an occasion, such as a book, alcohol, flowers or foodstuffs.	No	Yes
High value – between £25 and £50	E.G. ornaments, clothing, jewellery, expensive pens, or electronic equipment.	No	Yes
High value - more than £50		Yes	Yes
Monetary gift - of any value*	E.G. cash or redeemable vouchers.	Prohibited	-

* Monetary gifts **must not** be provided. The only exception would be if they are offered as part of an incentive scheme approved by the Principal, and offered to college students as an acknowledgement of their achievement or involvement in an event (e.g. an Open Evening). In these circumstances, book tokens, music vouchers or small cash payments under £20 may be authorised.

If a colleague or Governor of the Board feels that it would be appropriate to give a gift with a value of more than £50, then a 'Request for Approval to Offer or Accept a Gift' application should be made - **please see Appendix 2 - 'Request for Approval to Offer or Accept a Gift' Procedure and Guidance Notes.**

If a declaration is required, this **should** be made within 5 working days of giving the gift.

Hospitality Giving - Approval and Declaration Limits

Type of Hospitality	Venue	Approval Required	Declaration Required
Hot and cold drinks, biscuits, cakes or other snacks	At an LTE Group property	No	No
Working breakfast or lunch	At an LTE Group property		
Working breakfast or formal lunch	Restaurant (or other venue) away from an LTE Group property		
Drinks reception, or similar networking event	Any venue		
An evening meal	Any venue	No	Yes
Expensive and exclusive hospitality (see below)	Any venue	Yes	Yes

If a declaration is required, this **should** be made within 5 working days of giving the hospitality.

Expensive or Exclusive Hospitality

There is no comprehensive definition of what constitutes expensive or exclusive hospitality, but it would include invitations to major sporting or cultural events. This would be particularly so if the offer is made to only a small number of people.

Offering expensive or exclusive hospitality could very easily be **perceived negatively** by our stakeholders or by the press.

Therefore, the **default position should be to not offer** expensive or exclusive hospitality, **unless** it is deemed that the offer has a proper purpose and that it meets all the criteria listed above.

If a colleague or a Governor of the Board does feel that it would be appropriate to make such an invite, then a 'Request for Approval to Host or Attend an Event' application should be made - **please see Appendix 3 - 'Request for Approval to Host or Attend an Event' Procedure and Guidance Notes.**

Gifts and Hospitality: Approval Process

Prior approval is required, and must be requested, as follows:

Request	Form	Action
To offer or accept a gift that has an estimated value of more than £50.	'Request for Approval to Offer or Accept a Gift' - Appendix 2	Download form from the HUB and complete. Email the form to the Anti-Bribery Officer - AClose@lategroup.co.uk
To offer or accept any hospitality that may be deemed expensive and/or exclusive.	'Request for Approval to Host or Attend an Event' - Appendix 3	Download form from the HUB and complete. Email the form to the Anti-Bribery Officer - AClose@lategroup.co.uk

Once a request is received, the Anti-Bribery Officer will perform a first review, and then forward the request on to the Chief Executive Officer (CEO) for final approval or rejection. The colleague or Governor of the Board making the request, will then be informed of the decision in writing (normally this will be provided by email).

The **only exception** to the above would be if the request was made by the Chief Executive Officer. In this instance, the Anti-Bribery Officer will perform a first review, and then forward the request on to the Chair of the Board of Governors for final approval or rejection.

Colleagues and Governors of the Board **must not** offer or accept a gift, an invitation or attend an event that meets the criteria above, **unless** they have received written approval.

Gifts and Hospitality Register: Recording

The Gifts and Hospitality Register provides a list of all the Gift and Hospitality declarations made within a 12 months period.

The Register is a standard template made available to all colleagues and Governors of the Board, and is a tool to promote transparency in gifts and hospitality transactions.

The Register serves as an audit trail to protect both LTE Group and individual colleagues / Governors of the Board from allegations of impropriety. It may be used for reporting and disclosure purposes, including Freedom of Information requests (see below).

In line with the principles outlined in the relevant sections above, all colleagues and Governors of the Board **must** make any required gift or hospitality declarations (given, received and refused) within **5 working days** of receipt – **please see Appendix 1 - Gift and Hospitality Declarations Procedure and Guidance Notes**.

Gifts and Hospitality Register: Reporting

Reporting to the Audit and Risk Committee

On an annual basis, the Anti-Bribery Officer **must** report to the Audit and Risk Committee all the gift and hospitality declarations that have been made on the Gifts and Hospitality Register.

Freedom of Information Requests

The Freedom of Information (FOI) Act 2000 came into force in January 2005, and gives a legal right of access to information which is held by LTE Group.

If a relevant request is made under the Act, then declarations made on the Gifts and Hospitality Register may be required to be reported to third parties.

Appendix 1 – Gift and Hospitality Declarations Procedure and Guidance Notes

Procedure

If, as per the policy above, a declaration is required, then this **should be made within 5 working days** of giving, receiving or rejecting the gift or hospitality.

To make a declaration:

- 1) Log into the HUB.
- 2) Hover over the 'Group' menu, and from the list of departments select 'Finance'.
- 3) Select 'Know How'.
- 4) Select 'Gifts and Hospitality Declaration'.
- 5) Complete the declaration and submit.

Guidance Notes

Field	Guidance Notes
Name	Please enter your details, as the person who has offered, or has been offered or given, a gift or hospitality.
Role at LTE Group	
Workplace Location	
Contact Number	
Status: Provider or Recipient	Please state whether this declaration relates to: - a gift or hospitality that you have given to a third party (Provider); or - whether it relates to a gift/hospitality that a third party has offered and/or given to you (Recipient).
Name of Third Party	Please state the name, job title and organisation of the third party.
Nature of Business Relationship	Please describe the nature of your business relationship (if any) with the third party.
Date Gift or Hospitality Offered or Given	Please state the date the gift or hospitality was offered or given.
Approval Granted (Y or N or N/A)	If applicable, please confirm if approval was granted (in writing) prior to acceptance. Please note: As per the policy, approval must be obtained if the estimated value of the gift is more than £50, or if the hospitality is deemed to be expensive and/or exclusive.
Brief Description of Gift or Hospitality	Please enter a brief description of the gift or hospitality offered, given or received.
Reason for Gift or Hospitality Offered	If known, please state the reason why the gift or hospitality was offered, e.g. relationship management, a thank you, recognition of collaboration etc.
Total Value (known or estimated)	Please enter the estimated value of the gift or hospitality. This should relate to the value of the gift or hospitality offered, and not the cost to the provider. It may be difficult to estimate the value, but an internet search could be performed to find the cost of a similar item or event. At the very least, an estimation should be made of which of the thresholds set out in the policy above (£5, £25 or £50) the value of the item exceeds.
Accepted or Rejected	If you were the intended recipient (as an individual or on behalf of LTE Group), please state whether you accepted or rejected the gift or hospitality.
Date Accepted or Rejected	If different from the date the gift or hospitality was offered or given, then please state the date of acceptance or rejection.
Reason for Acceptance or Rejection	Please give an indication of why you chose to accept or reject the gift or hospitality. For example, if you rejected the gift, this may be because of the: - value of the gift/hospitality, if it exceeds the normal maximum; - nature of the gift or hospitality: e.g., if it does not meet the criteria for acceptance outlined in the policy; - nature of the provider: e.g., if the gift or hospitality is from an organisation or individual with a history of unethical practice; or - context of offer: e.g., if the offer of the gift or hospitality by a service provider coincides with their tender for a contract.
Retained or Surrendered	If this declaration is in respect of a gift received, please state whether you have retained or surrendered. Please note: As per the policy, gifts with an estimated value of more than £50 must be surrendered.
Additional Comments	Please add any further information required to clarify any points you have made in this declaration.

Appendix 2 – ‘Request for Approval to Offer or Accept a Gift’ Procedure and Guidance Notes

Procedure

As per the policy, if a colleague or a Governor of the Board wishes to **offer or accept a gift with a value of more than £50** on behalf of LTE Group, then a ‘Request for Approval to Offer or Accept a Gift’ application should be made.

Written approval is required **before** an offer or acceptance can be made.

Please email your request to the Anti-Bribery Officer (AClose@lategroup.co.uk), providing all the required information listed in the table below.

Guidance Notes

Information to Provide	Guidance Notes
Name	Please enter your details, as the person who wishes to offer, or accept (on behalf of LTE Group), a gift with a value of more than £50.
Role at LTE Group	
Workplace Location	
Contact Number	
Status: Provider or Recipient	Please state whether this request relates to: - a gift that you wish to give to a third party (Provider); or - whether it relates to a gift that you wish to accept from a third party (Recipient).
Name of Third Party	Please state the name, job title and organisation of the third party.
Nature of Business Relationship	Please describe the nature of your business relationship (if any) with the third party.
Date Gift Offered or Given	Please state the date the gift was offered or given.
Brief Description of Gift	Please enter a brief description of the gift you wish to offer or accept.
Reason for Gift	If known, please state the reason why you think the gift has been offered, or why you wish to offer the gift e.g. relationship management, a thank you, recognition of collaboration etc.
Total Value (known or estimated)	Please enter the estimated value of the gift. This should relate to the value of the gift offered, and not the cost to the provider. It may be difficult to estimate the value, but an internet search could be performed to find the cost of a similar item.
Supporting Comments	Please add any further comments to support your request, as to why you think this gift should be offered or accepted.

Appendix 3 – ‘Request for Approval to Host or Attend an Event’ Procedure and Guidance Notes

Procedure

As per the policy, if a colleague or a Governor of the Board wishes to offer or accept **hospitality that is deemed to be expensive and/or exclusive**, then a ‘Request for Approval to Offer or Accept a Gift’ application should be made.

Written approval is required **before** an offer or acceptance can be made.

Please email your request to the Anti-Bribery Officer (AClose@lategroup.co.uk), providing all the required information listed in the table below.

Guidance Notes

Information to Provide	Guidance Notes
Name	Please enter your details, as the person who wishes to offer, or accept expensive and/or exclusive hospitality.
Role at LTE Group	
Workplace Location	
Contact Number	
Status: Provider or Recipient	Please state whether this request relates to: - expensive and/or exclusive hospitality that you wish to offer to a third party (Provider); or - whether it relates to expensive and/or exclusive hospitality that you wish to accept from a third party (Recipient).
Name of Third Party	Please state the name, job title and organisation of the third party.
Nature of Business Relationship	Please describe the nature of your business relationship (if any) with the third party.
Date of Event	Please state the date of the event.
Brief Description of the Hospitality	Please enter a brief description of the expensive and/or exclusive hospitality you wish to offer or accept.
Reason for the Hospitality	If known, please state the reason why you think the expensive and/or exclusive hospitality has been offered, or why you wish to offer the expensive and/or exclusive hospitality e.g. relationship management, a thank you, recognition of collaboration etc.
Total Value (known or estimated)	Please enter the estimated value of expensive and/or exclusive hospitality. This should relate to the value of the hospitality offered, and not the cost to the provider. It may be difficult to estimate the value, but an internet search could be performed to find the cost of attending a similar event.
Supporting Comments	Please add any further comments to support your request, as to why you think hosting or attending would increase your effectiveness in discharging your role or otherwise further LTE Group's interests.

Owner: Chief Financial Officer
Group Audit Committee
Date of approval: 18th July 2023
Review cycle: three years