

Gifts and Hospitality Policy

Competition Service

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1 Policy Statement

In general, the Service does not believe that it is appropriate for employees to accept gifts from customers, suppliers, or a person who has business connections with the Competition Appeal Tribunal, or any other organisation who is party to a case before the Tribunal. This is because it is important to ensure that no employee acts in any way that is inconsistent with the Service's objectives or with its integrity by accepting a gift in circumstances where it could influence, or be seen to influence, its actions or decisions.

2 Scope

This policy forms part of the terms and conditions of all employees' contracts of employment and any breach of the policy will be regarded as misconduct, leading to disciplinary action up to and including summary dismissal.

3 Gifts and Hospitality Policy

Routine working practices bring employees into contact with outside organisations where it is normal business to offer gifts and hospitalities to facilitate working relationships.

These offers can place employees in a compromising position. However, those making such offers can sometimes be offended, and misunderstandings can arise, if offers are refused.

To this end the following guidelines should be followed:

- The conduct of staff should not foster the suspicion of any conflict between their official duty and their private interest;
- The action of staff acting in an official capacity should not give the impression to any member of the public, to any organisation with whom they deal or to their colleagues that they have been influenced by a gift or consideration to show favour or disfavour to any person or organisation;
- That if the staff member is in doubt about the propriety of accepting the gift or offer of hospitality the matter should be referred to the Registrar or the Director, Operations.
- That all gifts and hospitality not excluded as minimal (see below) should be recorded on an official form, kept in the Finance Department. The forms should be completed with the detail of the gift or hospitality, the estimated value, whether it was accepted or rejected (in accordance with this policy) and should also be authorised by the employee's direct line manager.

Competition Service staff should not normally accept gifts worth more than £50 from individuals, suppliers or organisations. However, if the refusal of a gift might cause offence, e.g. when offered by a delegation from overseas, the gift can be accepted but it becomes the property of the Service. The individual receiving the gift will have the option of purchasing the gift for its market value less £50. Gifts of minimal value (\leq £10) such as pencils, diaries etc do not need to be recorded.

Hospitality should not be accepted if it could be seen to compromise personal judgement or integrity. Minimal levels of hospitality, such as coffee and biscuits at meetings or sandwich lunches, do not need to be recorded. Where there is doubt whether to accept invitations the Registrar or Director, Operations should be consulted. Hospitality should not be accepted if the value exceeds £100.

NO GIFTS OR HOSPITALITY CAN BE ACCEPTED FROM ANY PERSON OR ORGANISATION WHO IS A PARTY TO A CASE BEFORE THE COMPETITION APPEAL TRIBUNAL.