

NOTTINGHAM CITY HOMES**REPORT OF THE SENIOR GOVERNANCE
OFFICER****AUDIT COMMITTEE
1 MAY 2013****REGISTER OF GIFTS AND HOSPITALITY – EMPLOYEES AND BOARD
MEMBERS****1 SUMMARY**

- 1.1 A report for information, advising the Audit Committee of the gifts and hospitality accepted or declined by Employees and Board Members for the period 1 April 2012 to 31 March 2013.
- 1.2 The Bribery Act 2010 came into force on 1 July 2011 and the formal guidance was produced to assist companies' compliance with the Act. The Act requires organisations to have adequate procedures in place to prevent bribery.

2 RECOMMENDATIONS

- 2.1 It is recommended that the Audit Committee note the report.

3 REPORT**3.1 EMPLOYEES**

- 3.1.1 The Company's HR Handbook advises employees "the acceptance of gifts and/or hospitality by employees must be treated with extreme caution" and provides for circumstances where it may be appropriate for employees to accept or decline the offer of a gift or hospitality.
- 3.1.2 A Register of Gifts and Hospitality has been established, and records the entries as prescribed in the Code of Conduct for Employees.
- 3.1.2 The attached extract from the Register of Gifts and Hospitality sets out the gifts and hospitality recorded for the period 1 April 2012 to 31 March 2013.

3.2 BOARD MEMBERS

- 3.2.1 The Board Members Code of Conduct Clause 7 Gifts, advises Board Members the receipt of gifts should be always avoided and sets out the limited circumstances in which Board Members may accept gifts and have them recorded in the register.
- 3.2.2 Clause 8 Hospitality sets out the circumstances in which Board Members may accept occasional and modest hospitality, with the approval of the Chair and recorded in the register.
- 3.2.3 Since 2006, there have been no entries for gifts and hospitality in respect

of Board Members past and present.

4 OTHER OPTIONS

4.1 None recommended.

5 FINANCIAL & RISK IMPLICATIONS

5.1 Financial and reputational risk that business decisions are unduly influenced by third party hospitality and gifts.

6 IMPLICATIONS FOR NOTTINGHAM CITY HOMES OBJECTIVES

6.1 Not directly, but reputational risks associated with non-compliance with Company requirements could impact on the achievement of Company objectives.

7 VALUE FOR MONEY & EFFICIENCY ISSUES

7.1 Clear procedures for obtaining and reporting on gifts and hospitality aid the efficiency and effectiveness of Company Managers.

8 EQUALITY & DIVERSITY IMPLICATIONS

8.1 Has the equality impact of these proposals been assessed?

Yes (EIA attached)

No (this report does not contain proposals for significant changes to process at this stage, however, an EIA will be undertaken if significant changes are made to the process)

9 BACKGROUND MATERIAL AND PUBLISHED DOCUMENTS REFERRED TO IN COMPILING THIS REPORT

9.1 Bribery Act 2012
HR Handbook
Standing Order Part 1: Governance

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