

**Register of Gifts - Members of the S4C Authority
Guidelines for the receipt of gifts and hospitality**

September 2009

1. Introduction

- 1.1 The S4C Authority (the "Authority") has adopted the Register of Gifts (the "Register") to ensure that any gifts or hospitality received by any Member of the Authority in relation to their duties to the S4C Authority are clearly recorded to ensure that no conflicts of interest can arise.
- 1.2 Occasionally, Members may be offered gifts or hospitality while carrying out their duties or responsibilities on behalf of the Authority. The purpose of these guidelines (the "Guidelines") is to specify how such offers should be dealt with.
- 1.3 The underlying principle is that the appropriateness of accepting any gifts or hospitality should be carefully considered. The first duty of Members is to ensure that no conflicts of interest arise in the performance of their duties. Members who are offered gifts or hospitality should also consider how the offer may be interpreted by a member of the public. If any doubt exists, Members should seek advice, and Members should remember that they must be open, transparent and sincere in relation to all such offers.
- 1.4 These Guidelines are in addition to the Code of Practice for Authority Members, which outlines the behaviour expected of Members when carrying out their duties on behalf of the Authority. All Members should be familiar with the provisions of the Code of Practice and these Guidelines.
- 1.5 The Authority will review these Guidelines regularly to ensure their suitability in safeguarding the Authority's interests, and to ensure that an effective system is in place to record gifts and hospitality accepted by Members.

2. Gifts

- 2.1 When undertaking duties or responsibilities on behalf of the Authority, Members should not accept substantial personal gifts from contractors or external suppliers. However, it is deemed acceptable to accept small keepsakes, which need not be registered. Examples of acceptable gifts include mugs, calendars, writing pens or diaries which may bear the donor's name or logo.
- 2.2 Members should record all accepted gifts in the Register which is kept by the Secretary to the Authority as soon as is practicable upon receipt of the gift.
- 2.3 When any gift is accepted (regardless of its monetary value), the Member to whom it is given must explain to the donor that acceptance of the gift will not confer any advantages to the donor in his dealings with the Authority.
- 2.4 Any inappropriate gifts should be declined and returned, with a polite but firm explanation as to why the gift cannot be accepted. The Secretary must be informed of any declined gifts as soon as possible after the refusal of the gift.

- 2.5 With the exception of participation in events arranged by or on behalf of the Authority, Members should avoid making use of services provided by contractors who are employed by or on behalf of the Authority to receive supplies of goods, labour or equipment at reduced prices. This condition, however, does not prevent Members from obtaining services and goods at reduced prices when the same discounts are available to any member of the general public.

3. Hospitality

- 3.1 Any Member who is offered hospitality as a result of their responsibilities and duties on behalf of the Authority should give careful consideration to the circumstances relating to each offer. The size and monetary value of each offer shall be relevant, in addition to the frequency of its occurrence and the person making the offer. It would be inappropriate, for example, except in very rare circumstances, to accept an offer from a company, partnership, group of individuals or an individual if the person making the offer were applying for a contract or financial or other gains from the Authority.
- 3.2 Hospitality is defined as anything which exceeds the offer of soft drinks and light refreshments which would be considered a reasonable social norm. Members should avoid hospitality where only the Member has been invited to the event. Offers of hospitality should only be accepted when invitations to attend social or sporting events are an intrinsic part of life in the community or whenever the attendance of an Authority representative would be expected.
- 3.3 Members should record all hospitality received in the Register, which is kept by the Secretary to the Authority, as soon as practicable after receipt of the hospitality.
- 3.4 Upon receipt of authorised hospitality, Members should be aware of the timing of the hospitality in relation to decisions to be made by the Authority which may affect the hospitality providers.
- 3.5 It will be acceptable for Members to accept hospitality by way of attendance at conferences, seminars and relevant courses when it is made clear that the hospitality is of a corporate rather than personal nature, when the Chair of the Authority has given consent beforehand and when the Chair of the Authority is satisfied that the hospitality will not pose any threat to decisions regarding purchases made by or on behalf of the Authority.
- 3.7 When an offer of hospitality must be declined, the person making the offer must be informed politely but firmly of the regulations and standards which exist within the Authority. The Secretary should be informed of any declined offer of hospitality as soon as possible after its refusal.

4. The Register

- 4.1 The Register which will be kept by the Secretary under the conditions of these Guidelines will be available for inspection by the public.

5. Providing Advice

- 5.1 In cases where advice may be needed regarding the value or appropriateness of accepting gifts or hospitality, advice will be available to Members from the Secretary to the Authority.

**The S4C Authority
September 2009**