



Glasgow City Council

Code of Conduct for Employees

1.0 Introduction

- 1.1 The public is entitled to expect the highest standards of conduct from all employees who work for local government. This Code of Conduct incorporates existing policies, regulations and conditions of service and provides further guidance to assist employees in their day-to-day work. The Code is based on the recommendations of the Nolan Committee on the Standards of Conduct in Local Government in England, Scotland and Wales and has been agreed with all Trade Unions representing all employees with Glasgow City Council. It also applies to employees' conduct both within the Council and when dealing with other organisations as a representative of the Council. The principles detailed below are the basic ones governing all Glasgow City Council employees but each Head of Department may wish to issue further guidance specifically relating to his/her departmental service requirements which will supplement but not contradict the basic principles contained in this Code. It is not intended that these principles will impinge in any way on the requirements set down by any employees' professional body.
- 1.2 The Code does not affect an employee's rights and responsibilities under the law; its purpose is to provide clear and helpful advice. Because of the nature of their work, parts of the Code may apply to some employees more than others, but all employees must comply with the Code. A breach of the Code may give rise to disciplinary action, which will be taken in accordance with the Council's Code of Discipline. As far as possible, employees must also comply with the Code of Conduct if they are appointed as a representative of the Council on any organisation, trust or company.
- 1.3 The Code incorporates "The Seven Principles of Public Life" identified by the Nolan Committee on Standards in Public Life. These are listed below:-
- 1.3.1 **Selflessness**
- Employees should not take decisions, which will result in any financial or other benefit to themselves, their family, or their friends. Decisions should be based solely on the Council's best interests.
- 1.3.2 **Integrity**
- Employees should not place themselves under any financial or other obligation to an individual or an organisation, which might influence them in their work with the Council.



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1.3.3 **Objectivity**

Any decisions, which employees take in the course of their work with the Council, including making appointments, awarding contracts, or recommending individuals for rewards or benefits, must be based solely on merit.

1.3.4 **Accountability**

Employees are accountable to the Council as their employer. The Council, in turn, is accountable to the public.

1.3.5 **Openness**

Employees should be as open as possible in all the decisions and actions that they take. They should give reasons for their decisions and should not restrict information unless this is clearly required by Council policy or by the law.

1.3.6 **Honesty**

Employees have a duty to declare any private interests, which might affect their work with the Council.

1.3.7 **Leadership**

If they are in a managerial position, employees should promote and support these principles by their leadership and example.

2.0 The Following Areas are where these Principles Will Apply

2.1 Standards

2.1.1 Local government employees are expected to give the highest possible standard of service to the public, and where it is part of their duties, to provide appropriate advice to Councillors and fellow employees with impartiality. Employees will be expected to bring to the attention of the appropriate level of management any significant impropriety or breach of procedure which would impact on the provision of the service. More detailed guidance is contained within the Council's Policy on Whistleblowing, detailed in the attached Appendix 1.



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2.2 Recruitment

2.2.1 Employment of Relatives/Disclosure of Relationships

Employees involved in appointments must ensure that these are made on the basis of merit. It is unlawful for an employee to make an appointment, which was based on anything other than the ability of the candidate to undertake the duties of the post.

If employees are conducting interviews are part of their job, they must disclose, prior to the interviews taking place, any relationship known to exist between them and the candidate for interview. This should be reported to their Line Manager in the first instance. Advice on the application of this paragraph is contained within the Code of Practice on Recruitment and Selection for Appointment or Promotion.

No relative of a Chief Officer or Directorate of a Department shall be offered an appointment in that Department without consultation with the Executive Director, Corporate Services and/or Chief Executive and the prior consent of the departmental committee *where appropriate*.

Employees must also not be involved in decisions relating to discipline, promotion or pay adjustments for any other employee who is a relative, partner, etc.

2.2.2 Canvassing of members or Employees of the Council

Canvassing of members or employees of the Council directly or indirectly in connection with any appointment within the Council, will disqualify the candidate. Employees must not solicit for any person for any appointment within the Council or recommend any person for such appointment or for promotion. This, however, will not prevent them from giving a written testimonial of a candidate's ability, experience or character for submission to the Council with an application for appointment.

(paras 1:1.10/1:2.6 of the Conditions of Service refer)

2.2.3 Politically Restricted Posts

In terms of the Local Government and Housing Act 1989, a person who holds a "politically restricted post" is disqualified from being or becoming a member of a local authority, member of the House of Commons or member of the European Parliament and Scottish Parliament. Certain other restrictions on the political activities of these officers have been introduced by regulations by the Secretary or State for Scotland. Details of these restrictions and the posts covered by these restrictions are contained in Section 2 of the Conditions of Service.



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The public expects all employees to carry out their duties in a politically neutral way, and Councillors must respect this. The political activities of a small number of employees are restricted by law.

Employees must serve the Council and all Councillors, regardless of their personal political outlook. The Chief Executive and Senior Officers have ultimate responsibility to help ensure that the policies of the Council are implemented.

Employees must implement the policies of the Council irrespective of their personal views.

If any employee is asked by a Councillor to provide assistance with a matter which is clearly party political or which does not have a clear link with the work of the Council, a polite refusal should be given and the Councillor should be informed that the matter will be referred to the employee's line manager.

2.3 Relationships

2.3.1 The Public

Employees should always remember their responsibilities to the community which they serve and ensure courteous, efficient and impartial service delivery to all groups and individuals within that community. Each member of the public should be dealt with fairly, equitably and consistently in line with the Council's Equalities Policy.

2.3.2 Councillors

Employees are responsible to the Council through its senior managers. For some employees, their role is to give advice to Councillors and senior managers and all are there to carry out the Council's work. Mutual respect between employees and Councillors is essential to good local government. Close personal familiarity between employees and individual Councillors can damage the relationship, and prove embarrassing to other employees and Councillors, and should therefore be avoided.

2.3.3 Political Groups

Political groups may sometimes seek advice from Council employees. Employees must follow the Council's procedure, detailed below.

The office bearers (of the group) must first approach the Chief Executive or relevant Director and employees should check whether this has happened. If not they should refer the matter to the Chief Executive.



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The office bearers must tell the Chief Executive what type of advice they are seeking.

The Chief Executive will decide whether attendance at the meeting is appropriate and which employee or employees should attend and notify them accordingly.

Once the employee has given the advice to the group the employee must leave the meeting before any decision is made.

The employee must observe strict confidentiality. The discussion in one political group should not be disclosed to another political group or to any member of such a group.

2.3.4 **Access to Councillors**

Employees are entitled to raise with their Councillor any complaint which they have about the services of the Council. If their complaint concerns any aspect of their work with the Council, however, they must make use of the Council's Grievance Procedure.

2.3.5 **Fair and reasonable treatment at work**

Employees are entitled to expect fair and reasonable treatment from their colleagues, managers and from Councillors. If employees feel that they have been unfairly treated or have been discriminated against, they are entitled to make use of the *Council's Harassment Policy, Grievance Procedure and/or Whistleblowing Procedure*.

There may be rare occasions when they feel that they have been required by a colleague, a Councillor or a member of the public, or by an organisation, to act in a way which might be illegal, improper or unethical, or which is otherwise in conflict with the principles of this Code of Conduct. They must inform their line manager accordingly.

2.3.6 **Contractors**

In accordance with the Council's conditions of service, all senior officers (defined as grade 12 and above) are required to submit annual declarations of interest and to notify the Chief executive in writing of any change of circumstances as soon as that change has occurred. This also applies to certain other employees in posts below the rank of Chief/Depute Chief official particularly those involved in competitive tendering procedures. (para 4.1.1 of Conditions of Service refers)



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Employees must be fair and impartial in the procurement process and in their dealing with contractors, sub-contractors and suppliers.

Orders and contracts must be awarded on merit, by fair competition against other tenders, and no special favour should be shown to businesses run by, for example, friends, partners or relatives in the tendering process. All personal relationships with contractors of a business of private nature with external contractors or potential contractors must be made known to the appropriate manager.

If employees are involved in the tendering process they must follow the Council's procedures and rules about tenders and contracts. Contracts must be awarded in accordance with the Council's standing Orders Relating to Contracts.

In particular, if any employees are contemplating a management buyout of a contractor or potential contractor, they must, as soon as they have formed a definite intent, inform their appropriate manager and withdraw from the contract awarding processes.

If they have access to confidential information on tenders or costs for either internal or external contractors, they must not disclose that information to any unauthorised individual or organisation.

2.3.7 Conflicts of interest

Council employees have an obligation to act in the best interest of the Council and to avoid situations where there may be a potential conflict of interest. Conflict of interest may arise where an individual's personal or family interests and/or loyalties conflict with those of the Council. Interests can be financial or non-financial and can include other paid/unpaid employment, membership of a professional body, trade association or trade union of shareholding where the nominal value of interest exceeds 1/100th of the total nominal value of the issued share capital or £1,000 which is less. Accordingly, all Council employees should declare their interests to their line manager. This should be recorded in a register by the line manager.

In addition all employees who sit on the boards of external bodies, or who are involved with them are required to submit annual declarations of interest (to notify the Chief Executive of any changes) if they or a closely connected person to them is involved in the any of the following areas of work.

- Advice and/or assistance on the availability of council grant funding to external organisations.
- Amendment and monitoring of application for and of Council grant funding.
- Council grant funding administration.



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A closely connected person is a spouse, partner, cohabitee, close relative (parent, sibling, child or grandchildren) or more distant relative who is part of your family unit, or a business partner.

Employees are required to notify the Chief Executive in writing of any change of circumstances as soon as that change has occurred.

2.4 **Acceptance of Other Remunerative Employment/Private Professional Practice**

2.4.1 Heads of Department and Deputies excepted, no restriction shall be placed on employees undertaking other employment of a remunerative nature out with normal working hours, provided the additional employment does not interfere with or impair their ability for the efficient execution of their duties within the Council's service.

Employees shall not engage, however, in work for any individual firm or body where the Council has been, or could be involved in the transaction or other business, or where the work in any other way impinges on the Council's interests.

Employees must not do private work for submission to any Department of the Council, nor act for any person who is in negotiation with the Council, in view of the possibility of conflict of interest and the implications which might be taken from such action.

The onus is on employees to ascertain whether any conflict occurs and to raise the matter in the first instance with their Head of Department.

If employees wish to market, patent or otherwise exploit ideas, inventions, or other products, where they are using knowledge or information gained in the employment of the Council, they must advise their Head of Department accordingly. (paras 4.1.4/4.2.4 of the Conditions of Service refer).

2.5 **Other Outside Duties or Services during Business Hours**

2.5.1 During the period of their employment, employees will not be permitted to hold any outside office, position of employment, the duties of which would entail their absence from work during normal business hours, without the consent of the departmental committee involved, but this instruction does not debar a Head of Department from authorising an employee:-

2.5.1.1 to be absent occasionally and temporarily during business hours to attend to duties or services of an honorary, charitable or philanthropic character, so long as these do not interfere with efficient discharge of Council duties, or



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2.5.1.2 to take leave of absence during office hours for similar duties or services.

All employees may accept invitations to undertake lectures appropriate to their professional qualifications. Where such lectures are given out with normal office hours, or are given within normal office hours, but are of an infrequent nature, any fees may be retained. For lectures given within normal office hours, where the lectures cover a given period of pattern, prior permission must be sought from the Executive Director, Corporate Services and any fees that received, excluding out-of-pocket expenses, must be paid to the Council or the time off must be set against the employee's annual leave entitlement. (paras 4.1.5./4.2.5 of the Conditions of Service refer).

2.6 Openness and Disclosure of Information

2.6.1 The Council's decision making process must be transparent and open. The Council must provide the public with clear and accessible information about how it operates. It must also ensure that there is an effective complaints procedure in place for the public to use when things go wrong.

2.6.2 The council is committed to ensuring that all data collected, held or obtained under its control is dealt with in an ethical and legally responsible manner. Failure to do so would jeopardise the credibility of the council and may cause the council to breach disclosure legislation.

The Council's policy is that in general information will be made available. There are exceptions, however, to this principle of openness where confidentiality is involved, and information may be withheld if, for example, it would compromise a right of personal or commercial confidentiality. This does not apply where there is a legal duty to provide information. Employees must not break the law in this area.

In particular, information must not be supplied concerning employees to any person out with the service of the Council unless the consent of the employee is first obtained. This will not apply where there is a statutory duty to provide information, e.g. Inland Revenue, DSS etc. or in the process of prevention or detection of fraud, as detailed below. If there is any doubt employees should raise the matter with their line manager. (paras 4.1.2/4.2.2 of the Conditions of Service refer)

Breaches of confidentiality will constitute a breach of the code of conduct for employees which could result in disciplinary action, up to and including dismissal. Under the Data Protection Act 1998, breaches of confidentiality can lead in certain circumstances, to legal proceedings against employees as individuals.

Employee may be required to sign a confidentiality or non-disclosure agreement for specific posts.



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2.7 **Fraud Detection and Misuse of Resources**

2.7.1 **Fraud Detection**

All Local Authorities have a responsibility to prevent fraud. As a result of the decision by the Policy and Resources Committee at its meeting on 17th June 1997, any information collected by the Council will be used and disclosed where necessary to prevent and detect fraud. It will also be shared for the same purpose with Public Bodies or other Organisations which handle Public Funds. This is covered under the criteria laid down by the Data Protection Act 1998.

Action may also be taken under the Council's Code of Discipline against any Council employees detected fraudulently completing Council Tax/Housing Benefit forms or misusing a Blue Badge (disabled parking permit).

2.7.2 **Bribery & Corruption**

Under the Bribery Act 2010 it is important that employees are aware that is a serious criminal offence to

- Offer, promise or give someone a reward to make them perform their functions or activities improperly.
- Accept, agree to accept or request a reward in return for performing a relevant function or activity improperly.
- Bribe a foreign public official in order to win business, keep business or gain business advantage for the organisation.

The Council will not employ individuals who do not abide by the terms of the Act.

Any suspected contravention will be investigated internally and where the Council consider that a breach of the Act has occurred this will be referred to the relevant regulatory authority for further action as appropriate. Furthermore disciplinary action may be taken against the employee including dismissal.

2.7.3 **Use of Financial Resources**

Employees must ensure that public funds entrusted to them are used in a responsible and lawful manner. They must strive to ensure value for money to the local community and to avoid legal challenge to the Council.

2.7.4 **Use of Other Resources**

All employees serve the public, and they must remember the seven principles when they use Council equipment, materials and resources, in order to ensure value for money.



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Employees must not breach the policy of the Council on the personal use of Council equipment. In particular, guidance has already been issued by the Director of Information Technology entitled “Security Guidance for Computer Users” and it stresses that the Council and its employees are legally required to follow good security practices by:-

- keeping personal data secure (Data Protection Act)
- only using licensed software (Copyright, Designs and Patents Act)
- not attempting to gain unauthorised access to data and systems (Computer Misuse Act)

The Council does not allow access to social media websites from its computers or mobile technology at any time. A limited number of employees have access to some sites for business purposes only. The use of social networking sites, email or other online resources to post or access messages or images which are defamatory, obscene, libellous or inappropriate will be treated as misconduct under the Code of Discipline, Disciplinary and Appeals Procedure and may lead to dismissal in cases of gross misconduct. Employees should ensure that they do not conduct themselves in a way that is detrimental to the Council, employees, clients or Service Users either during working hours or in their personal lives when using their own equipment.

2.7.5 Further information can be found within the Whistleblowing and Response Policy

2.8 **Hospitality**

2.8.1 Employees must follow the Council’s policy on declaring offers of hospitality and follow the current procedures for having any offers authorised, as detailed in the attached Appendix 2.

2.8.2 **Sponsorship - Giving and Receiving**

Where an outside organisation wishes to sponsor or is seeking to sponsor a Council activity, whether by invitation, tender negotiation or voluntarily, the basic conditions concerning acceptance of hospitality or gifts apply. Particular care must be taken when dealing with contractors or potential contractors.

Where the Council wishes to sponsor an event or service, no employee, or their partner, spouse or any relative may benefit from such sponsorship in a direct way without there being full disclosure to their line manager of any such interest. Similarly, where the authority through sponsorship, grant aid, financial or other means, gives support in the community, employees must ensure that impartial advice is given and that there is no conflict of interest involved.



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2.9 **Contacts with the Media**

- 2.9.1 All contact with the media should normally be directed through the Council's Public Relations Department where media officers are assigned to deal with enquiries from the press. Directors/Heads of Department and designated officers can, however, speak to the media only on issues related to their direct area of responsibility. Employees in any doubt regarding this should contact their immediate line manager.

2.10 **Public Statements**

- 2.10.1 Employees are entitled to express their views about the Council, provided they do not make use of any private information gained through their work with the Council. But, in their work capacity, they must not criticise the Council either through the media or at a public meeting, or in any written communication with members of the public.

2.11 **Conditions of Service**

- 2.11.1 All employees are governed by the Council's Conditions of Service. Copies of the Council's Conditions of Service and Personnel Policies and Procedures are available, for inspection, within their employing Department

2.12 **Legal Assistance**

If an employee is charged with a criminal offence or is subject to a civil action arising from action taken within the scope of his/her employment duties, and the Chief Executive is satisfied that the employee has acted responsibly, the Chief Executive has delegated authority to refund to the employee any reasonable legal costs incurred.



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Whistleblowing and Response Policy Appendix 1

1. Introduction

- 1.1 The Council is committed to ensuring that the opportunity for fraud and corruption is reduced as far as reasonably possible. Where fraud, corruption and other problems are suspected, reported or detected, they will be dealt with in a firm and controlled manner.
- 1.2 The purpose of the Whistleblowing and Response Policy is to advise and guide elected members, staff and the public about how fraud and corruption will be dealt with.
- 1.3 The policy set out in this document covers the following areas:
 - Preventing fraud and corruption.
 - The Council's rules and procedures.
 - The Council's whistleblowing and investigation arrangements.

2. Preventing fraud and corruption

- 2.1 The best way to tackle fraud and corruption is to prevent it from happening in the first place by:
 - Having clear rules and procedures and keeping them up to date.
 - Ensuring that suitable levels of internal check are included in working procedures, particularly financial procedures. It is important that duties are organised so that no one person can carry out a complete transaction without some form of checking process being built into the system.
 - Following the correct procedures when employing new staff including the taking up of references and disclosure checks.
 - Working with other organisations to prevent and detect fraud and corruption and participating in the National Fraud Initiative.
 - Maintaining and publicising whistleblowing facilities that allow and encourage staff and the public to raise concerns.

3. The Council's rules and procedures

- 3.1 A number of rules and procedures have been approved and adopted to ensure the Council's business is properly controlled. They form the basis of the Council's internal control process and it is important that all members and staff are aware of, and abide by, them.
- 3.2 The most important of these are:
 - Code of Conduct for Employees.
 - Financial Regulations, Management & Control Code of Practice.
 - Standing Orders Relating to Contracts.
 - Procurement Manual.



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- Scheme of Delegation.
- Employees' Conditions of Service.

- 3.3 Employee must follow the Code of Conduct at all times and also make sure that they read and understand the rules and procedures that apply to them and act in line with them.
- 3.4 Any breaches of these procedures and rules may result in disciplinary action which may include dismissal.
- 3.5 The Financial Regulations require all cases of actual or suspected fraud, corruption and theft to be reported immediately to the Head of Audit & Inspection. Executive Directors must ensure that all staff are aware of the reporting requirement.

4 Whistleblowing and Investigation Arrangements

4.1 Aims and Scope of the Arrangements

a) In addition to governing how investigations are dealt with, the arrangements aim to:

- Provide avenues for staff and members of the public to raise concerns and receive feedback on any action taken.
- Reassure whistleblowers that every effort will be made to protect them from reprisals or victimisation for whistleblowing in good faith.

b) There are existing procedures in place to enable staff to lodge a grievance relating to their own employment. Whistleblowing is intended to cover concerns that fall outside the scope of other procedures. Such concerns may be about something that:

- Is unlawful;
- Is against the Council's rules and procedures;
- Relates to standards or practices; or
- amounts to improper conduct.

4.2 Safeguards

a) **Harassment or Victimisation** The Council recognises that the decision to report a concern can be a difficult one to make, not least because of the fear of reprisal from those responsible for the malpractice. The Council will not tolerate harassment or victimisation and will take action to protect staff when they raise a concern in good faith. This does not mean that if a member of staff is already the subject of disciplinary or redundancy procedures, that those procedures will be halted as a result of their whistleblowing.

b) **Confidentiality** The Council will do its best to protect the identity of



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individuals who raise concerns and do not want their names to be disclosed. It must be appreciated, however, that the investigation process may reveal the source of the information and a statement by the individual may be required as part of the evidence necessary to show that an allegation is correct.

c) **Anonymous Allegations** Concerns expressed anonymously are much less powerful than concerns to which a person puts their name, but anonymous allegations will be considered at the discretion of the Head of Audit & Inspection. In exercising this discretion, account will be taken of:

- The seriousness of the issue raised
- The credibility of the concern
- The likelihood of confirming the allegation from attributable sources

d) **Untrue Allegations** If staff make an allegation in good faith, but it is not confirmed by the investigation, no action will be taken against them. If, however, individuals make malicious or vexatious allegations, the allegations will not be taken further and disciplinary action may result. The judgement of whether an allegation is malicious or vexatious rests with the Head of Audit & Inspection.

4.3 Raising a Concern

a) The Council's Whistleblowing arrangements are managed by the Head of Audit & Inspection and concerns can be reported by calling **0141 287 3777**. Calls will be answered between 08.30 and 17.00 Monday to Friday and outwith these times a message can be left. Alternatively, reports can be submitted using the web reporting facility. Letters can also be addressed to:

The Head of Audit & Inspection
Financial Services
City Chambers
Glasgow G2 1DU

b) The earlier the concern is expressed, the easier it is to take action.

c) Although individuals are not expected to prove the truth of an allegation, they will need to demonstrate to the person contacted that there are sufficient grounds for concern.

d) Staff may invite their Trade Union or professional association to raise a matter on their behalf.

4.4 How the Complaint will be dealt with

a) The Head of Audit & Inspection logs all reports and carries out a preliminary review in each case to determine the most appropriate course of action. The action will depend on the nature of the concern and will also be logged. Any matters which fall within the scope of other existing procedures (e.g. child protection, complaints or discrimination issues) will be dealt with under these procedures. Some concerns may be resolved by agreed action without the need for investigation. Matters to be investigated may be:

- dealt with internally by Internal Audit or other specialist sections such as the Corporate Fraud and Investigations, or
- referred to the Police or other external agency.

b) The Council will endeavour to keep named complainants informed of the progress of the investigation and will initially write to the complainant:

- acknowledging that the concern has been received,
- indicating how it proposes to deal with the matter,
- telling them whether any initial enquiries have been made, and
- telling them whether further investigations will take place, and if not, why not.

The Council may also ask for more information where this would assist in the investigation.

c) Investigations may result in recommendations for changes to procedures and systems which will be incorporated into action plans. Follow up reviews are carried out to ensure that recommendations are implemented.

d) Investigations may lead to disciplinary action against employees conducted in accordance with the Council's Disciplinary Procedures.

e) Where appropriate the Head of Audit & Inspection will refer findings to the Police for investigation or review, after discussion with the Chief Executive or Executive Director of Corporate Services.

f) Depending on the outcome of any enquiries it may not be possible to advise complainants of the outcome, e.g. if the matter is referred to the Police for further enquiries or to protect an individual's human rights.



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4.5 Internal Audit Contact Details

Duncan Black - Head of Audit & Inspection

duncan.black@fs.glasgow.gov.uk

0141 287 4053

William Hart - Assistant Head of Audit and Inspection

william.hart@fs.glasgow.gov.uk

0141 287 4303



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Hospitality/Acceptance of Gifts Appendix 2

1. Introduction

- 1.1 The information contained in this Appendix relates to the Codes of Conduct for employees. Whilst there are no hard and fast rules in this area, the following guidelines should provide employees with appropriate ways of dealing with the situations they may find themselves in regarding hospitality and gifts.
- 1.2 Gifts and hospitality include monetary gifts, free or subsidised travel or accommodation, goods or services, invites to functions, concerts and events.
- 1.3 The acceptance of gifts and/or hospitality must be approved by a member of their Service leadership team, or nominated authorising officer before they are accepted.

2. Hospitality Offered to Employees

2.1 Guidelines on the Receipt of Hospitality

The receipt of hospitality by employees should only be accepted when it is clearly in the Council's interests. It is essential that any suggestion of improper influence should be avoided. Hospitality must not be accepted knowingly during the tendering period of a contract and employees should always be aware of the possibility that the contractor/consultant offering hospitality may be tendering for a contract elsewhere in the Council. The clear rule of thumb is that when in doubt politely refuse.

- 2.1.1 The following examples give general guidance on acceptable and unacceptable hospitality:

2.1.1.1 Generally Acceptable

- a working lunch provided to allow the parties to discuss business, though it should be remembered that lavish provision could well raise questions.
- attendance in an official capacity at functions to which invitations have also been sent to representatives of other organisations.
- attendance in an official capacity at functions arranged by public utilities and public authorities.



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2.1.1.2 Generally Unacceptable

- the provision of holiday or weekend hospitality.
- the use of a company flat or hotel suite.
- lunch with a developer whose application is awaiting consideration by the Council
- an invitation to join other company guests at events involving lavish hospitality
- when a matter such as arbitration arises from a contract, **any** offer of hospitality should be refused even if, in normal circumstances, it would come within the acceptable category.
- repeat invitations by the same organisation/individual.

2.2 Guidelines on the Receipt of Gifts

It is important to be careful when gifts are offered by organisations (or their representatives) which are able to provide work, goods or services to the Council or which seek authority (e.g. licence, planning consent) from the Council to carry out their businesses. In general, therefore, an employee should politely refuse any personal gift offered to them or to any member of their family by any person or body when has, or seeks to have, dealings with the Council.

2.2.1 Gifts that may be accepted include:

2.2.1.1 Small gifts of a promotional or advertising character, which are often given to a wide range of people, e.g. calendars, diaries, pens, charts and other similar articles;

2.2.1.2 Small gifts given on the conclusion of a visit to factory, firm, community organisation or voluntary group of a type normally given by the organisation concerned, or where a contractor wishes to mark the completion of a new building, when such gifts are made to a number of people on the same occasion or as part of a normally accepted practice.

2.2.1.3 Small gifts where refusal would cause needless offence and the giver is not seeking a decision or business from the Council but merely wishes to express thanks for advice, help or co-operation received.

2.2.2 An exception is an expensive gift from a foreign visitor, which should generally be accepted since refusal might give offence. However, such gifts should not normally be accepted personally and should be treated in an appropriate



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fashion. The Council should retain ownership and safeguard the gifts or display them.

- 2.2.3 Where a gift is personal, valued at less than £20 and cannot be used by the Council, it may be accepted by an individual. However, employees should accept no personal gifts unless declared to and approved by a member of their Service leadership team, or nominated authorising officer.
- 2.2.4 Gifts of alcohol, hampers of food or other articles which could be misinterpreted by the public or assume a more serious importance in any form of future enquiry or investigation, should not be accepted. There may, however, be limited circumstances when it would be appropriate to accept such gifts and to pass them on to a charity. In these cases the giver's approval should be sought.
- 2.2.5 Gifts and Hospitality Register

A [register](#) recording the receipt of gifts and hospitality should be maintained by each Executive Director. Employees should notify a member of their Service leadership team, or nominated authorising officer of all offers, whether accepted, declined or used for charitable purpose. This must be recorded in the Gift and Hospitality register within 7 days of the offer. A member of your Service leadership team or nominated authorising officer must decide whether it is appropriate to accept the gift or hospitality or, if a gift, whether it is necessary to return it. Clearly any gift returned to the sender should be accompanied by a courteously worded letter explaining why the gift or hospitality may not be accepted. The return of a gift or its presentation to charity must be recorded in the register.

- 2.2.6 This is a very sensitive area and employees should operate on the basis that if they have any doubt then hospitality should be politely refused. In any case, the offer of or receipt of gifts or hospitality must always be reported to a member of your Service leadership team even if they are declined.
- 2.3 **In summary, if an employee is offered gifts or hospitality s/he must:-**
 - 2.3.1 Decide how to respond bearing in mind the guidance above whilst remembering that it is easy for the receipt of gifts, hospitality and entertainment expenses by employee to give rise to misconceptions. There must be no scope for accusations of bribery and corruption. A member of your Service leadership team or nominated authorising officer will be able to advise if individuals are uncertain on how to proceed.
 - 2.3.2 The Executive Director will report their register (detailing offers made to any employee in the Service) on the acceptance of gifts or hospitality (excluding small gifts) to the Executive Compliance Unit (Financial Services), who will maintain a record.



Glasgow City Council Code of Conduct for Employees

Hospitality/Acceptance of Gifts Appendix 2

3. Hospitality Offered by Employees

3.1 Within the Council Premises

3.1.1 It may be appropriate on occasions for employees to host a reception for a number of individuals and for refreshments to be provided from the Council budget. In such circumstances:

3.1.1.1 the reception should be relevant to the business of the Council.

3.1.1.2 where employees are involved, the Executive Director's approval should be obtained in writing.

3.1.1.3 all reasonable steps should be taken to ensure that costs are kept to a minimum and that they are appropriate to the occasion.

3.1.2 Each Executive Director will keep a register with details of the purpose and aims of functions together with the guest lists for future reference as required. Such registers will be available for inspection by the Chief Executive or Executive Director of Finance.

3.2 Outwith Council Premises

3.2.1 Wherever possible meetings between employees should take place in Council premises. In exceptional circumstances when such a meeting needs to be held over lunch or dinner or when some other form of hospitality is necessary all reasonable steps should be taken to ensure that costs are kept to a minimum. The same applies to meetings held with individuals or representatives of outside bodies to discuss Council business over lunch or dinner.

3.2.2 Expenses claims for lunches, dinners and other similar hospitality must only be made by the nominated Senior Officer if the subject(s) under discussion relate to Council business not private or party political matters.

3.2.3 If there is any doubt about the propriety of a particular claim or whether or not a subject relates to private or party political matters, advice should be sought from the Chief Executive.

3.2.4 When submitting a claim, employees should include details of the individual(s) for whom hospitality has been provided, together with the purpose and aim(s) of the meeting. These details will be kept in a register for future reference as required.