



ASA Broadcast and Non- Broadcast Corporate Policy

ITEM	Gifts and Hospitality Policy, Version 1.0
Date Valid From	01 July 2011
Review Date	01 July 2012

1. Aim

To provide clarity and guidance to ASA employees (including agency contracted staff) and Council members regarding the rules relating to gifts and hospitality

2. Principle

The ASA is a regulator and makes all decisions independently and objectively. The principle behind this policy is to ensure that the business conduct of all employees and Council members enhances its reputation and avoids the potential for any perceived or real conflict of interest, or allegation of bribery or undue influence.

3. Scope

This policy applies to all staff employed and engaged contractually by the ASA, ASA (B), CAP and BCAP.

4. Responsibility

The Director of Corporate Services (DCS) owns this policy and the 'Gifts and Hospitality register'. Individual staff, guided by their line managers, are personally responsible for deciding whether or not to accept any offer of a gift or hospitality, and for notifying the DCS, who will record the information on the register.

5. Gifts and hospitality

A 'gift' is defined here as any item, cash or goods, or any service which is offered for personal benefit at no cost or a cost that is less than its commercial value.

'Hospitality' is defined here as any generous offer of food, drink or attendance at an event, that is more than an incidental kind. Hospitality such as a beverage or light refreshment would qualify as incidental.

6. Statement of policy principles

The ASA wishes to build and maintain good relationships with all of its stakeholders, in order to understand their perspectives and to use their expertise to improve its decision-making. Staff and Council members are encouraged to play their part in this work. In doing so care must be taken to avoid any possibility that the organisation or those associated with it are subject to undue influence.



Whenever a staff or Council member receives an invitation they should consider whether acceptance assists in building or maintaining relationships with key stakeholders and how it would be perceived by others if it were widely known.

This policy only applies to material items worth more than £50. Gifts and Hospitality below this value are considered to be incidental and there is no need to register those items.

The ASA will maintain a register of gifts and hospitality with a value of £50 or more and of all material hospitality accepted in the course of official duties.

This policy does not apply if you are offered hospitality or a gift as a partner or spouse, unless there was any risk of this being perceived as an attempt to influence you in their ASA capacity..

7. Recording gifts and hospitality offered

The DCS maintains a register of all material gifts and hospitality, both accepted and declined. The DCS will be responsible for reporting on the register to the Audit Committee once a year in order to facilitate regular review of the policy. The register could also be disclosed upon request.

It is each individual's responsibility to inform the DCS by email of any gifts received or hospitality that is offered but subsequently declined. In brief, the individual should:

- consider carefully whether it is appropriate to accept a gift or hospitality;
- decline gifts or hospitality unless to do so would cause serious embarrassment; and donate all gifts to the Staff Council Christmas Raffle
- estimate its approximate value and where the monetary value cannot be readily ascertained discuss the situation with Chairman or Chief Executive/DCS prior to accepting the gift.

8. Borderline cases

If you are in any doubt discuss the matter with your line manager. Borderline cases which cannot be decided by agreement of the line manager should be decided by the Chief Executive or in exceptional cases by the Chairman of the ASA.

9. Compliance

Employees who are found not to have acted in accordance with the above policy may be disciplined and in serious cases may be dismissed on the grounds of gross misconduct.



Received by /Offered to:	Date	Received/ Offered from:	Nature of gift or hospitality	Assessed Value	Reason for gift and if it was accepted or not