

## Policy on Gifts and Hospitality

### 1. General

No gift or hospitality should be accepted by SFT Board members or employees which could give rise to an inference that a member or employee might be induced to act improperly in the performance of their activities. You must never canvass or seek gifts or hospitality. Any gifts and hospitality offered, whether or not accepted, with a monetary value greater than £50 must be recorded and a record made available for public inspection. SFT maintains a Hospitality Register which is regularly published on the company website.

Details of any gifts or hospitality offered and whether it is accepted or declined must be submitted to the Office Manager within 7 days for inclusion on the register.

You should also consider whether there may be any reasonable perception that any gift received by your spouse or cohabitee or by any company in which you have a controlling interest, or by a partnership of which you are a partner, can or would influence your judgement.

If in any doubt advice should be sought from the SFT Chief Executive.

### 2. The Bribery Act 2010

The Bribery Act 2010 makes it an offence to request, agree to receive or accept a financial or other advantage, with the intention of inducing improper performance by the recipient. What constitutes an “advantage” could, in principle, include gifts and corporate hospitality and “improper performance” is a breach of the expectation that our activities are performed in good faith and impartially by virtue of the fact that SFT is in position of trust.

#### 2.1. Business Gifts

You should not normally accept business gifts other than items of very low value, normally under £15. However, regardless of their value, you should always consider whether the gift is intended to induce improper performance. Appropriate gifts may be accepted as a thank-you for a

speaking engagement or similar, with any such gift over the value of £50 recorded. Where possible, an offer of a gift other than one of a very low value, should be politely declined. Where this is not possible, for example gifts given at a public event or gifts received through the post, then the gift may be returned if possible cost effectively and without causing embarrassment, or donated for charitable purposes. The term “gift” includes benefits such as relief from indebtedness, loan concessions, or provision of services at a cost below that generally charged to members of the public.

## **2.2. Hospitality**

Accepting modest hospitality is part of a business relationship. However, anyone accepting hospitality must be aware of the risk of being perceived by others to have been influenced in making a business decision as a result of accepting such hospitality. Hospitality should always be reasonable and proportionate and the more lavish the hospitality and the higher the expenditure, the greater the risk is that it may be considered a bribe.

How often and how much hospitality we accept should not be significantly greater than SFT would be likely to provide in return.

Hospitality which involves the provision of overnight accommodation or has a monetary value greater than £50 must be registered in the Register of Hospitality. You must not accept repeated hospitality from the same source except isolated gifts of a trivial character or inexpensive seasonal gifts such as a calendar or a diary, or gifts received on behalf of SFT.

## **3. Relationship to Procurement**

It is particularly important to be aware of gifts and/or hospitality from organisations that may be bidders, or associated with bidders on projects or programmes over which SFT has an influence. Gifts and/or hospitality should not be accepted at periods that may be considered sensitive i.e. shortly before an award of contract or conduct of a tender procedure, either by SFT or in respect of a project where SFT is involved, which may involve the party offering the hospitality.

Any offer of gifts or hospitality from such an organisation should be notified to the Chief Executive for specific consideration.

**Hospitality and Gift Register – 1 July to 30 September 2013**

<b>Date Received</b>	<b>Recipient</b> (name & position)	<b>Item</b>	<b>From</b> (name & company)	<b>Estimated Value</b>	<b>Declined/ Accepted</b>
03 July 2013	Martin Blencowe Associate Director	Reception to mark opening of Wester Hailes Healthy Living Centre	Elizabeth Meyer JMA Architects	Unknown	Accepted
03 July 2013	John Hope National Hub Programme Director	Mott Macdonald Golf Day	Richard Cantley Mott MacDonald	Unknown	Declined
03 July 2013	Barry White Chief Executive	Currie & Brown Summer Barbeque	Stephen Gemmell Currie & Brown	Unknown	Declined
10 July 2013	Nicola Barclay Manager	Shepherd and Wedderburn Planning and Environment Group annual drinks party	Colin Innes Shepherd and Wedderburn	Unknown	Accepted
16 July 2013	Peter Reekie Finance Director	Open Golf at Muirfield	Charles Livingstone Brodies	Unknown	Declined
18 July 2013	Martin Blencowe Associate Director	Festival Fireworks Party	Mark Findlay Gardiner & Theobald	£50	Declined
24 July 2013	Barry White Chief Executive	Davis Langdon Annual Dinner	Pauline Parke Davis Langdon	Unknown	Declined
24 July 2013	Colin Proctor Asset Management Director	Davis Langdon Annual Dinner	Pauline Parke Davis Langdon	Unknown	Declined
24 July 2013	Peter Reekie Finance Director	Davis Langdon Annual Dinner	Pauline Parke Davis Langdon	Unknown	Declined
24 July 2013	Christa Reekie Commercial Director	Davis Langdon Annual Dinner	Pauline Parke Davis Langdon	Unknown	Accepted

Date Received	Recipient (name & position)	Item	From (name & company)	Estimated Value	Declined/ Accepted
25 July 2013	Paul Devine Associate Director	Golf Afternoon at Dunbar	Ewan Alexander Pinsent Mason	£50	Accepted
26 July 2013	Martin Blencowe Associate Director	Festival Fireworks Party	Ian Stewart BDG Architects	Unknown	Declined
29 July 2013	Martin Blencowe Associate Director	Spifox Charity Golf Event	Paul Sherry Faithful and Gould	Unknown	Accepted
30 July 2013	Morag Wallace Associate Director	Forth Replacement Crossing evening of viewing, refreshments and live music	Paul McGirk Hub South East Ltd	Unknown	Declined
30 July 2013	Gemma Gordon Schools Programme Director	Forth Replacement Crossing evening of viewing, refreshments and live music	Paul McGirk Hub South East Ltd	Unknown	Declined
30 July 2013	John Hope National Hub Programme Director	Forth Replacement Crossing evening of viewing, refreshments and live music	Paul McGirk Hub South East Ltd	Unknown	Declined
30 July 2013	Colin Proctor Asset Management Director	Forth Replacement Crossing evening of viewing, refreshments and live music	Paul McGirk Hub South East Ltd	Unknown	Declined
31 July 2013	Mikko Ramstedt Associate Director	Thomson Bethune End of Summer Party	Beth Law-Cooper Thomson Bethune	Unknown	Declined
08 August 2013	Peter Reekie Finance Director	50 <sup>th</sup> Anniversary Reception – Dr Martin Luther King Jnr’ s I have a Dream speech	Zoja Bazarnic US Consulate General	Unknown	Accepted
08 August 2013	Nicola Barclay Manager	Edinburgh Festival Fringe event	Antony Aitken Colliers International	Unknown	Declined
12 August 2013	Barry White Chief Executive	Scottish Awards for Quality in Planning 2013	John McNairney Scottish Government	Unknown	Accepted

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13 August 2013	Barry White Chief Executive	Forth Road Crossing viewing and boat trip	Ken Gillespie Galliford Try	Unknown	Declined
13 August 2013	Barry White Chief Executive	Any Construction Questions Event	Ken Gillespie Galliford Try	Unknown	Declined
13 August 2013	Peter Reekie Finance Director	Any Construction Questions Event	Ken Gillespie Galliford Try	Unknown	Declined
16 August 2013	Paul Dodd Manager	Mott Macdonald Golf Day	Fraser McQuarrie Mott MacDonald	Unknown	Accepted
18 August 2013	Martin Blencowe Associate Director	New Office Opening Reception	Stuart Munro Buro Happold	£40	Declined
19 August 2013	Paul Dodd Manager	Davis Langdon Annual Dinner	Pauline Parke Davis Langdon	Unknown	Accepted
20 August 2013	Barry White Chief Executive	BDG Edinburgh Festival Fireworks	Emma Brodie BDG	Unknown	Declined
22 August 2013	Sarah Eynon Manager	Step Change RoS post completion event	Callum Sinclair DLA Piper	Unkown	Accepted
03 September 2013	Barry White Chief Executive	Scotland's Rural College Reception and Dinner	Bob Webb SRUC	Unknown	Declined
04 September 2013	Morag Wallace Associate Director	Any Construction Questions Event	Paul McGirk Hub South East Ltd	Unknown	Accepted
04 September 2013	John Hope National Hub Programme Director	Any Construction Questions Event	Paul McGirk Hub South East Ltd	Unknown	Accepted

Date Received	Recipient (name & position)	Item	From (name & company)	Estimated Value	Declined/ Accepted
04 September 2013	Gemma Gordon Schools Programme Director	Any Construction Questions Event	Paul McGirk Hub South East Ltd	Unknown	Declined
06 September 2013	Barry White Chief Executive	Year to Go Ryder Cup Dinner	Ken Gillespie Galliford Try	Unknown	Accepted
09 September 2013	Martin Blencowe Associate Director	New Office Opening Reception	Stuart Cobb Doig and Smith	£40	Declined
12 September 2013	Kerry Alexander Associate Director	Action for Children Quiz Event	Richard Cantlay Mott MacDonald	Unknown	Accepted
13 September 2013	Iain Wardrop Manager	ACES (Association of Chief Estates Officers Scotland) dinner	Ged Hainey Ryden	Unknown	Declined
17 September 2013	Peter Reekie Finance Director	Edinburgh Macmillan Art Show 2013 – Private Viewing	Charlie Dunn Miller Construction	Unknown	Declined
17 September 2013	Barry White Chief Executive	Edinburgh Macmillan Art Show 2013 – Private Viewing	Charlie Dunn Miller Construction	Unknown	Declined
18 September 2013	Christa Reekie Commercial Director	Dinner Invitation – A Question of Science with Dara O’Briain	Graeme Palmer Burness Paull LLP	Unknown	Declined
18 September 2013	Ann Leslie Associate Director	Dinner Invitation – A Question of Science with Dara O’Briain	Graeme Palmer Burness Paull LLP	Unknown	Declined
19 September 2013	Paul Moseley Associate Director	Dinner Invitation – The Scottish Resources Awards	Bethan Griffiths Ameycespa	Unknown	Declined
20 September 2013	Peter Reekie Finance Director	Property – The Changing Landscape in Scotland, Roundtable dinner discussion	Lori Anderson Grant Thornton	Unknown	Accepted
25 September 2013	Alastair Young Associate Director	Dinner Invitation – The Scottish Resources Awards	Bethan Griffiths Ameycespa	Unknown	Declined