

Table of key differences between Commercial Services and Kent County Council policies (by notable exception)

Policy	Commercial Services (CS)	Kent County Council (KCC)
Anti-Bribery and Hospitality Policy	<p>Allows the acceptance of some gifts and hospitality up to £75 without prior authorisation or recording on the Gifts and Hospitality register.</p> <p>However also stipulates clear examples of unacceptable forms of gifts &amp; hospitality e.g.</p> <ul style="list-style-type: none"> <li>• any cash or cash equivalent payments</li> <li>• frequent and regular acts of gifts and hospitality</li> </ul> <p>Can accept payment of travel and accommodation by a third party for fact finding (e.g. potential acquisition target) or business review visits. Requires prior approval of a Director and is only permitted for justified business reason.</p> <p>No reference to use of loyalty cards – not relevant.</p> <p>CS will not enter into sponsorship agreements with any business which is in legal or financial conflict with the company or which connects the company with any political party or pressure group. However, personal conflicts are dealt with in the Declarations of Interest policy which requires employees to declare any financial or non-financial interests which may conflict with Commercial Services' interests</p>	<p>Not permitted to accept significant personal gifts, fees, loans, personal discounts or other rewards/advantages from contractors, clients or outside suppliers. Hospitality may be accepted if there is a genuine need to impart information, the function is part of the life of the community, or where KCC should be seen to be represented. All acceptances and refusals, except for minor articles such as diaries and calendars, must be recorded and authorised.</p> <p>KCC is required to meet the cost of any visits to inspect equipment etc. to avoid jeopardising the integrity of any subsequent purchasing decisions.</p> <p>The use of loyalty cards issued, for example, by supermarkets, petrol stations and high street stores is prohibited when purchasing goods or services on behalf of KCC.</p> <p>Where KCC wishes to sponsor an event or service, neither you, nor your partner, spouse, close friend or relative must benefit from such sponsorships. There should be no conflict of interest.</p>
Expenses Policy	Permits staff to claim for professional memberships e.g. Institute of Directors. Requires prior approval of a Director and is only permitted for justified	Membership of a professional body after completion of study is not reimbursed.

## Appendix A

	business reason.	
Corporate Charitable policy	<p>Describes the governance arrangements for establishing partnerships with charities to support fund raising or increase the charity's profile. The business is regularly asked for charitable contributions. This policy will formalise the charities supported, and seek to derive a business benefit through the association. Management of the process will include:</p> <ul style="list-style-type: none"> <li>• a charity committee</li> <li>• commitment to support two charities per year</li> <li>• the selection process based on % of donations going to the good cause.</li> </ul>	KCC has no equivalent policy or references in existing procedures.
Sponsorship Policy	<p>Describes the governance arrangements for entering into corporate sponsorship arrangements with another organisation or its activities. This includes:</p> <ul style="list-style-type: none"> <li>• A business case describing benefit and cost</li> <li>• Separate account codes</li> <li>• Return on investment</li> <li>• Risk analysis</li> <li>• Communication</li> <li>• A formal sponsorship agreement</li> <li>• Reviews of the initiative</li> <li>• Exec and Board sign off limits for spend</li> </ul> <p>The Commercial Services Anti-Bribery Policy will apply to the corporate policy for Sponsorship and vice versa</p>	KCC has no equivalent policy or references in existing procedures

## Appendix A

Recruitment Policy	Recruitment at senior level (£50K base level and/or a direct report into an executive member) must include a two interview process and be agreed with the HR Director.	The Council's Constitution states that Directors and Corporate Directors (KR16 and above) must be interviewed and appointed by the Personnel Committee or Member Panel (sub-committee), with the Corporate Director of Human Resources (or other Senior Manager as determined by the Committee or Panel) acting as adviser to the appointing body.
Declaration of Interest Policy	The Commercial Services Board (including NEDs) Executive Team and second tier managers must explicitly make a declaration on an annual basis even when no conflict exists. The DoI must be counter signed by the Chair of Audit Committee for Board members. The DoI for the Chair of Audit must be counter signed by the Chairman of the Board	<p>The Kent Code states that staff are required to declare annually to an appropriate senior manager any financial and non-financial interests or commitments, which may conflict with KCC's interests.</p> <p>Details of the salary and expenses, declarations of interest, and gifts and hospitality for Directors and Corporate Directors is available to view by the public at <a href="http://kent.gov.uk">kent.gov.uk</a></p>
Procurement Policy and Procedures	<p>Guidance provided to staff on:</p> <ul style="list-style-type: none"> <li>• Section 95 Business Unit Procurement Procedures</li> <li>• Teckal and Core Business Unit Procedures</li> </ul>	<p>In April 2014 the Governance and Audit Committee agreed to replace Spending the Council's Money and:</p> <ul style="list-style-type: none"> <li>• provide a simplified interactive electronic version;</li> <li>• remove information on how to undertake procurements over £50k and instead refer services to the Strategic Sourcing &amp; Procurement team;</li> <li>• provide clear guidance and documentation for procurements under £50k; and</li> <li>• provide separate guidance on contract management and specification writing.</li> </ul>