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| Policy Name | Gifts & Hospitality |
| Policy Category | Governance |
| Policy Number | G12 |
| Date to Management Committee | March 2025 |
| Previous Review | November 2021 |
| Next Review Date | March 2028 |
| Links to other Policies | G01 Code of Governance for Committee Members, G04 Payments, Benefits & Corporate Accountability G11 Donations, S04 Code of Conduct for Staff |
| Consultation | Staff, Committee |

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1.0 POLICY AIMS AND OBJECTIVES

As a charitable Housing Association we have clear guidelines on how to respond to offers of hospitality that occur in the normal course of business. From time to time both Committee members and Association staff may be offered gifts, favours or hospitality, usually by contractors or consultants, as a direct result of their membership of the Committee or their employment with the Association. Similarly, it may be that from time to time gifts or hospitality are given by the Association to outside bodies or individuals.

The Code of Governance for Committee Members and the Code of Conduct for Staff emphasises that staff and Committee members must act, and be seen to act, wholly in the interests of our organisation, our residents and other service users. They should not benefit improperly from their position. They must not accept any offers of gifts or hospitality from individuals or organisations which might reasonably create (or be capable of creating) an impression of impropriety, influence or place them under an obligation to these individuals or organisations.

The aim of this policy is to ensure that all staff and committee members are aware of what is acceptable, and how to respond to offers of gifts or hospitality.

This policy applies to all governing body members including co-opted members and to all staff employed by Knowes and any people working on a freelance basis on our behalf.

2.0 RISK ASSESSMENT

There are a number of risks to the Association in relation to receiving and giving gifts and hospitality, and this policy is in place to minimise the following risks to the Association:

- Staff and or Committee could breach the Code of Conduct for Staff or the Code of Governance for Committee members by accepting hospitality or gifts which are considered to be excessive in nature.
- Staff and or Committee could put themselves in a position where they are open to accusation of favouring a supplier through accepting gifts or hospitality
- The reputation of the Association could be put at risk through accepting gifts or hospitality of an inappropriate nature
- Staff and or Committee could be seen to benefit through their position in the Association.

3.0 NATURE OF GIFTS OR HOSPITALITY

3.1 The majority of gifts or hospitality are nothing more than a small token such as the gift of a diary, box of sweets from a tenant etc and are not designed to influence the award of any contract or the procurement of goods and services.

3.2 All Committee members and staff should, however be on their guard if the type or nature of gift/hospitality exceeds that of a trivial nature. Even if gifts are not deliberately offered in an attempt to solicit work or the purchase of goods by the Association, their acceptance can compromise the integrity of Committee/staff members alike.

4. PROCEDURE

- 4.1 When gifts/hospitality are offered to any Committee/staff member, the offer should be reported to the Association’s CEO and recorded in the Gifts and Hospitality Register (located in CEO’s Office)
- 4.2 It is generally acceptable to receive a gift of a trivial nature, which should be recorded, however anything which breaches the guidelines (section 6) should be declined and the matter reported to the CEO and duly recorded.

5. GUIDELINES

- 5.1 The following describes the types of gift/hospitality which are considered both acceptable and unacceptable and Committee/staff should attempt to adhere to these guidelines at all times:

| <u>Acceptable</u> | <u>Unacceptable</u> |
|--|---|
| Pens | Monetary Gifts |
| Diaries | Food and drink (in excessive quantities) |
| Key Rings | Tobacco Products |
| Calendars | Trips/Hotel Accommodation |
| Sweets/Chocolates | |
| Food and Drink (in reasonable quantities) | |

- 5.2 It is generally accepted within the Housing Association movement that Contractors/Consultants may contribute to post development and other Association festivities. This type of gift/hospitality is considered acceptable when enjoyed by Committee, staff, consultants, contractors and other invited guests.
- 5.3 Staff and or Committee members may be invited from time to time to attend corporate hospitality in some shape or form, this could be a charity event, a trades event, involve food and drink or other activities. It is recognised that forging good working relationships with our contractors is good business practice, however staff must be aware that offers to attend events that are not considered “de minimus”, having no substantive value is not acceptable. For example offers of foreign travel or overnight hotel accommodation would not be considered “de minimus”. Staff and Committee must also consider that whilst attending such events, they are representing the Association and must act appropriately.

Staff and Committee must not accept regular hospitality from the same supplier as this could lead to allegations of influencing.

6. OFFERING OF GIFTS AND HOSPITALITY

- 6.1 Similarly, there may be occasions when the Association, either Committee or senior staff shall deem it appropriate to offer hospitality or make gifts to individuals or organisations. Generally, however, this will be confined to donations to local organisations, sponsorship of local organisations or small gifts to mark particular occasions. It may also be appropriate to provide lunch for guests/visitors or external consultants on occasion. Provided the costs are reasonable and no regular pattern is evident, the offer of gifts and hospitality is acceptable.

7. AVOIDANCE OF DOUBT

- 7.1 If any Committee or staff member is in any doubt whatsoever as regards to the type or nature of hospitality to be offered or accepted, they should check the matter with the Association's CEO
- 7.2 If it is proposed to accept a formal written invitation to any significant event, the CEO should be informed, the invitation recorded in the Hospitality Register and disclosed at the next full Management Committee Meeting. The views of the Management Committee should be taken in doubtful cases.
- 7.3 In general, staff or Committee members must not give the impression that they may be influenced in any way, by any gift or consideration to show favour or disfavour to any person or organisation. Staff or Committee members should not use their official position to receive, agree to accept or attempt to obtain any payment or other consideration for doing, or not doing, anything or showing favour, or disfavour, to any person. They should not receive benefits of any kind from a third party, which might reasonably be seen to compromise their personal judgement and integrity.

8. Equalities Statement

Through this policy, no member of staff will be discriminated against on grounds of sex or marital status, on racial grounds, or on grounds of disability, age, sexual orientation, language or social origin, or of other personal attributes, including beliefs or opinions, such as religious beliefs or political opinions.

9. POLICY REVIEW

- 9.1 The above policy will be reviewed every 3 years or sooner if required.