



POLICY: GIFTS AND HOSPITALITY TO STAFF

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Copies of this Policy are available in alternative formats.

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POLICY: GIFTS AND HOSPITALITY TO STAFF

All reference to 'we', 'our' or 'us' in this Policy should be read as meaning Sandbourne Housing Association.

1. Purpose and aim of the Policy

- 1.1 Under the Prevention of Corruption Act 2013 and the Bribery Act 2010, it is an offence for employees to accept gifts or consideration as an inducement or reward for:
 - 1.1.1 doing (or not doing) anything in an official capacity, or
 - 1.1.2 showing favour (or disfavour) to anyone in an official capacity.
- 1.2 Under the Prevention of Corruption Act 2013, any money, gift or consideration (including hospitality) received from a resident or organisation seeking to obtain a contract will be deemed to have been received corruptly, unless proved otherwise.
- 1.3 The expectation is that all our staff will conduct themselves with integrity, impartiality and honesty at all times.
- 1.4 Staff should maintain high standards of propriety and professionalism. This includes avoiding laying themselves open to suspicion of dishonesty and not putting themselves in a position of conflict between their official duty and private interest. Staff should be aware that gifts and hospitality, offered by residents, applicants, contractors, suppliers, service providers, and others, might place them in a vulnerable position. Even when offered and accepted in innocence, others may misconstrue the intention behind such gifts.
- 1.5 In the interests of openness and integrity, we will maintain a central register of gifts and hospitality, as a record of instances. The purpose of the register is to protect individual members of staff from accusations of impropriety.
- 1.6 The guiding principles are:
 - 1.6.1 the conduct of an individual should not create suspicion of any conflict of interest between official duty and private interest
 - 1.6.2 the action of individuals acting in an official capacity should not give the impression to any member of the public; to any organisation with whom they deal; or to their colleagues, that they have been or may have been influenced by a benefit to show favour or disfavour to any person or organisation.

- 1.7 It is a disciplinary matter and criminal offence for a member of staff to accept any benefit as an inducement or reward that leads them in an official capacity to:
 - 1.7.1 take any action, or not to take action
 - 1.7.2 show favour, or disfavour, to anyone.
- 1.8 Any action taken against staff or Board members will be in accordance with our Policies and Rules.
- 1.9 This Policy will be interpreted by reference to the Housing Corporation's Regulatory Code of Good Practice, Note 3, September 2002.
- 1.10 The Chief Executive has overall responsibility for implementation of this Policy.

2. Acceptance of gifts and hospitality

- 2.1 Staff should not accept any gift, reward or hospitality from any organisation or individual with whom they have contact in the course of their work as an inducement for either doing something or not doing something in their official capacity.
- 2.2 It is important to take particular care about any gift from a person or organisation that has, or is hoping to have, a contract with us. Although it is conventional in some parts of the private sector, and in other countries, for businesses to exchange gifts, this is not an acceptable practice for us.
- 2.3 Individuals shall not accept gifts, without reference to line managers. The recipient of unsolicited gifts from contractors or tenants should normally return them with a polite explanation that our rules do not allow their acceptance. In such an event, the recipient should advise their line manager.
- 2.4 Staff must record any gifts offered, and whether or not they were accepted, in the central register maintained by us.

3. Accepting hospitality

- 3.1 A member of staff may sometimes receive conventional hospitality such as attending, in an official capacity, a social event organised by another body for promotional or influential purpose.
- 3.2 In general, it may be necessary to decline offers of hospitality exceeding the norm of conventional hospitality. The following forms of hospitality, in particular, should be avoided:
 - 3.2.1 significant hospitality offered in substitution for fees for broadcasts, speeches, lectures or other work done
 - 3.2.2 inducements that could lead to a contractual position between us and a supplier, contractor or consultant
 - 3.2.3 substantial offers of social functions, travel or accommodation

- 3.2.4 repeated acceptance of meals, tickets and invitations to sporting, cultural or social events, particularly from the same source, unless approval has been given by the line manager, Chairman, or the Board
- 3.2.5 any offer of hospitality by a resident which may be seen by other tenants as likely to lead to favourable or unfavourable treatment of any individual.
- 3.3 Particular care should be taken when offered any form of hospitality or gift from a person or organisation that has, or is hoping to have, a contractual relationship with us.
- 3.4 If staff are in any doubt about whether to accept hospitality offered, they should refer the matter to their line manager.

4. Breaches of policy

- 4.1 Non-compliance with the above requirements will be deemed a disciplinary matter for staff and will be handled in accordance with our disciplinary procedure. If it is a Board member in breach, the matter will be dealt with in accordance with our Rules.
- 4.2 If it is proven that actual fraud has taken place, we may be required to institute criminal proceedings.

5. Equality impact assessment

Age	Neutral
Being or becoming a transsexual person	Neutral
Being married or in a civil partnership	Neutral
Being pregnant or on maternity leave	Neutral
Disability	Neutral
Race including colour, nationality, ethnic or national origin	Neutral
Religion, belief or lack of religion/belief	Neutral
Sex	Neutral
Sexual orientation	Neutral

6. Consultation arrangements

- 6.1 Our staff will be consulted on this Policy and any reasonable suggestions will be taken into account before the Policy is approved by the Board.

7. Other related policies

- 7.1 Reference should also be made to the following Policy:
 - 7.1.1 Managing Tenants' Financial Affairs
 - 7.1.2 Anti-bribery and Corruption