

GIFTS AND HOSPITALITY POLICY 2019

1.0 BACKGROUND:

The following policy statement has been prepared in accordance with recognised good practice in corporate governance and is intended to confirm the Association's position in relation to gifts and hospitality for both Management Committee and staff.

2.0 GENERAL PRINCIPLES:

Staff and Committee should treat the offer of any gift or hospitality with extreme caution.

Where such an offer is obviously significant this should be refused without hesitation.

The term significant is defined as follows "*where it (the offer) could be seen as attempting to influence an individual's or organisation's decision*".

To a certain extent this will require individuals to apply judgement and common sense.

Any offers of gifts or hospitality where there appears to be an attempt to influence an individual's or organisation's decision should be notified to the Chief Executive at the earliest possible opportunity. In the event that the Chief Executive is subject to the above, the Chairperson should be notified at the earliest possible opportunity.

3.0 Reference to Code of Conduct for Staff

Paragraphs A1 and A2 of the Code of Conduct for Staff deals with Gifts and Hospitality in the section on Honesty and Integrity where it states;

A.1 You must act, and be seen to act, wholly in the interests of our organisation, our residents and other service users. You should not benefit improperly from your position.

A.2 You 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 you under an obligation to these individuals or organisations. You must comply with our policy on the matter.

4.0 EXCEPTIONS

It is accepted that the work of staff and / or Committee may involve a degree of entertaining or hospitality or where the acceptance of a small gift is entirely appropriate.

In general terms these will result from a general invitation to a lunch or other event as part of an organisation's normal business activity and where there is no way of such an acceptance being able to be construed as an attempt to influence an individual's judgement.

Under normal circumstances acceptance of such invitations should be restricted to organisations where there is an ongoing business relationship and where the basis of acceptance is clearly understood by all concerned.

Again, individuals will require to exercise sound judgement and common sense.

5.0 HOSPITALITY PROVIDED

It is also permissible for senior staff (ie the Senior Management Team) and Committee to provide hospitality by way of a lunch or other routine function as a means of offering thanks to business associates or organisations.

Properly incurred expenses associated with such an event can be claimed via the appropriate procedures and authorisation.

6.0 REGISTER:

The Association will maintain a register of all offers of gifts and hospitality whether accepted, refused or provided and it is the responsibility of all Committee and staff to notify the Chief Executive accordingly. The Chief Executive will maintain an up to date register which will detail the following;

1. Date
2. Details of offer of gift or hospitality
3. Estimated value
4. Who the offer has been made to
5. Who the offer has been made from
6. Whether the offer has been accepted (or) with signature of staff or committee
7. Whether the offer has been rejected with signature of staff or committee
8. Signed by Chief Executive/Company Secretary

In the event that it is the Chief Executive who is the subject of any gift or hospitality whether accepted, refused or provided then the Chairperson will be required to sign the register.

This register will be available for scrutiny by the Committee at all times but the contents will be specifically reviewed by the Finance, Audit and Corporate Governance Committee at least annually.

Anyone found not properly disclosing the necessary information may be subject to disciplinary measures in the case of staff or be asked to resign in the case of Committee members. In the event of the latter the Scottish Housing Regulator will require to be notified.

7.0 **POLICY REVIEW:**

This policy will be subject to review at least every 5 years.

George Tainsh
Chief Executive

30th October 2019

Policy Review and Consultation Process

Reviewed by the Management Team	N/A
Reviewed by the Finance, Audit and Corporate Governance Committee	7 th November 2019
APPROVED BY THE MANAGEMENT COMMITTEE	28th NOVEMBER 2019
Date of Next Review	October 2024

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DECLARATION

Signed..... **Date**

I(print name) have read and understood the aforementioned policy and accept the expectations and obligations contained therein.

Clarification and guidance as required, on any aspect of the policy, has been sought and obtained from the Chief Executive.