



GOVANHILL
HOUSING ASSOCIATION

GIFTS, HOSPITALITY AND DONATIONS POLICY

Approved : September 2018
Review Date : September 2021

If you have difficulty with sight, or if you require a translated copy of this policy, we would be pleased to provide the information in a form that suits your needs.

1. Purpose of this Policy

- 1.1 In this Policy, Govanhill Housing Association (GhHA) describes:
- Our approach to offering gifts and hospitality on a corporate basis
 - Our policy on making donations to good causes in our local communities and on seeking donations to support our work
 - How our committee members and employees must deal with any offers of gifts or hospitality they are offered by third parties.
- 1.2 The Policy applies to GhHA and our subsidiary Govanhill Community Development Trust (GCDT). References to “the Association”, “GhHA”, “we” and “our” apply equally to GCDT.

2. Policy Statement

- 2.1 To protect GhHA’s good reputation, we expect everyone associated with us to meet the highest standards of personal integrity and accountability, and to ensure responsible stewardship of GhHA’s income and resources.
- 2.2 We will adopt a prudent approach to offering gifts, donations or corporate hospitality and make sure that our actions are directly related to, or incidental to, our charitable purpose. We will also set clear rules about acceptance of gifts or hospitality from external parties by our committee members and employees. Our rules will promote compliance with:
- All relevant legislation (in particular, charity law and anti-bribery legislation)
 - All relevant regulatory standards (such as the Scottish Housing Regulator’s requirement that RSLs should conduct their affairs with honesty and integrity)
 - Our own Codes of Conduct for committee members and for employees.

3. Gifts, hospitality and donations provided by GhHA

Making gifts

- 3.1 GhHA will not normally make gifts to committee members or employees, unless allowed for in this Policy. We may make a gift in the following circumstances:
- To mark occasions where a gesture of appreciation or sympathy is appropriate. For example, bereavement, serious illness, leaving the organisation following long service or retirement.
 - To make awards to employees to mark long service or retirement.
- 3.2 We may also offer a gift as a gesture of thanks to external visitors, for example someone who has given up their time to perform a service or ceremony in support of our work.

- 3.3 The Chairperson and Director will have delegated authority to approve gifts made by GhHA valued at up to £50. Any proposal to make a gift valued above £50 will require Management Committee approval.
- 3.4 GhHA may lend computer equipment to a committee member to assist with their duties (for example, where committee papers are sent electronically). In these circumstances, the equipment will remain the property of GhHA and we will retain an appropriate declaration form signed by the member regarding this and also agreeing to internet use policy.
- 3.5 Gifts made by GhHA will be recorded in the Register of Gifts, Hospitality and Donations unless the gift is “de minimis”, i.e. the gift is not of significant value or material consequence. We define this as a gift valued at £25 or less.
- 3.6 Gifts or hospitality provided to staff on leaving the organisation do not need to be recorded in the Register if they are consistent with the procedures set out in the EVH terms and conditions.

Providing corporate hospitality

- 3.7 From time to time, GhHA may wish to commemorate or celebrate certain occasions or events. These might include:
- Events or receptions or to promote GhHA’s objectives and achievements
 - Opening of a new housing development
 - Making a gesture of appreciation at Christmas for committee members’ voluntary contribution during the year.
- 3.8 On such occasions, we may pay for food and refreshments for those attending. We may also provide corporate hospitality for official business meetings, occasional business lunches and occasions when GhHA has official visitors.
- 3.9 The Director will have delegated authority to approve any hospitality to be provided and will be responsible for ensuring that expenditure is proportionate and appropriate to the occasion.
- 3.10 All hospitality provided by GhHA will be recorded in the Register of Gifts, Hospitality and Donations unless the value is “de minimis”. We define this as hospitality valued at less than £15 per head.

Donations

- 3.11 GhHA may consider specific requests for charitable donations and may make an annual allowance in the budget to cover this. We will only make donations to non-profit making bodies and the donation must not conflict with the aims and objectives of GhHA.
- 3.12 As a registered charity, we will ensure that any donations we make are relevant to our own charitable purposes e.g. the donation will result in a direct or indirect benefit to our tenants, or will contribute to the wider economic and social regeneration or well-being of the communities we serve in Govanhill and Merrylee.

- 3.13 We may occasionally seek donations from contractors or suppliers towards charitable causes supported by GhHA. If we do this, any approach to contractors or suppliers must be authorised by a member of the senior management team and any donations received will be reported to the Management Committee.
- 3.14 All donations given or received should be recorded in the Register of Gifts, Hospitality and Donations, irrespective of their value.

4. Gifts or hospitality offered to committee members or employees by external parties

What is acceptable and what is not

- 4.1 In this section of the Policy, “you” refers to committee members and employees.
- 4.2 The rules we expect you to follow are shown in the short **Reference Guide** at the end of this Policy. The underlying principles are that you should:

- Comply with our Codes of Conduct;
- Never solicit gifts, hospitality or inducements;
- Never place yourself under any obligation to an external party;
- Always treat with caution any gifts or hospitality offered to you – seeking advice before accepting a gift or an offer of hospitality if you are at all unsure;
- Refuse any offers that are of a significant nature¹, or that could be seen by others as influencing your or the Association’s decisions;
- Only accept gifts or hospitality on a personal basis where our Policy allows this¹ and/or where it would be churlish or give offence to refuse.

Declaring and recording offers of gifts and hospitality

- 4.3 If you are offered any kind of gift or hospitality by an external party, you must always:
- **(Employees)** Inform your line manager or head of department of the offer, and whether you accepted or declined it.
 - **(Committee members)** Inform the Director or Chairperson of the offer, and whether you accepted or declined it.
- 4.4 If a gift or hospitality offered to you by an external party exceeds £25 in value, the offer must be recorded in GhHA’s Register of Gifts, Hospitality and Donations. Immediately after receiving any such offer, you must notify the Corporate Services and HR Team who will ask you to provide the following information, and then record the information in the Register.

¹ As set out in the attached Reference Guide

- The date of the offer and who made it
- A description of the gift or hospitality offered to you, including the estimated value
- Whether you accepted or refused the offer
- Any additional comments (e.g. gift accepted but it was passed on to GhHA to donate to charity)

4.5 You should also **send a copy of this information** to your head of department (employees) or to the Director or Chairperson (governing body members).

4.6 The Register headings shall be as shown in the box above. The Register shall include details of gifts and hospitality provided by GhHA, where the value exceeds £25 (gifts) or £15 per head (hospitality); and all donations made or received by GhHA irrespective of value. The Register shall be available for public inspection.

5. Circumstances not addressed in this Policy

5.1 While every attempt has been made to establish clear guidelines, other circumstances not covered by this Policy could arise. If this happens, committee and staff members should act in accordance with the spirit of the Policy, and protect themselves and GhHA's reputation for integrity.

5.2 If in any doubt about whether to accept or refuse an offer of a gift or hospitality, the offer should always be refused and/or guidance should be sought from the Chair or Director (committee members) or line manager/head of department (for employees).

6. Implementation and compliance

6.1 Awareness of the Policy will be promoted during induction and on an ongoing basis thereafter. The Director will have overall responsibility for ensuring that the Policy is implemented effectively. The Director will delegate operational responsibility for maintaining the Register to **the Director's PA**. Line managers and departmental heads also have responsibility for the specific actions described in the Policy.

6.2 Alleged breaches of the Policy will be fully investigated and may result in disciplinary action against committee or staff members. If committee members or employees have concerns about bribery or corrupt or inappropriate practice relating to gifts and hospitality, they should raise these under GhHA's whistle blowing procedures.

6.3 If any form of bribery or corruption is suspected, GhHA will report matters to the Police immediately and assist the Police in any criminal investigations. Where required, GhHA will also report the circumstances of any breaches or allegations to the Scottish Housing Regulator as a Notifiable Event.

6.4 The Management Committee will receive an annual report on gifts and hospitality given and received and on donations made or received by GhHA. The report will be compiled using the information entered in the Register of Payments, Benefits and Donations for the reporting period.

A BRIEF GUIDE TO.... GIFTS AND HOSPITALITY

THE GOLDEN RULE: if in ANY DOUBT about whether to accept a gift or an offer of hospitality, politely refuse the offer, or seek advice before accepting

GIFTS	HOSPITALITY
<p>YOU <u>SHOULD NOT</u> ACCEPT</p> <ul style="list-style-type: none"> ✗ Cash gifts or other kinds of payment, holidays, trips or other substantial items ✗ Regular gifts from the same source ✗ Personal gifts, other than token or insignificant gifts as described below ✗ Personal gifts from GhHA's consultants, suppliers or contractors, regardless of value ✗ Personal gifts of bottles of alcohol <p>YOU <u>MAY</u> ACCEPT GIFTS IN THESE CIRCUMSTANCES</p> <ul style="list-style-type: none"> ✓ Token gifts of low value given to you as a goodwill gesture (e.g. pens, diaries, calendars and other small promotional items) ✓ Small unsolicited gifts of appreciation (e.g. flowers or chocolates) made by residents or their relatives, where refusal would cause offence ✓ Other gifts of insignificant value (under £25) <p>GIFTS WITH A VALUE OF MORE THAN £25</p> <ul style="list-style-type: none"> ✗ Politely decline the offer, unless this would be churlish or cause offence ✓ If this is the case, you should tell the donor that you cannot accept the gift personally and if it is accepted, this must be on behalf of GhHA. ✓ The gift must be recorded in the Register (see box below) and then donated to charity by GhHA, or used in GhHA's charitable fund raising activities 	<p>YOU <u>SHOULD NOT</u> ACCEPT</p> <ul style="list-style-type: none"> ✗ Personal invitations or offers of hospitality that could be perceived as an attempt to improperly influence your/GhHA's decisions ✗ Personal invitations or offers of hospitality during or leading up to a tender/approval process ✗ Free tickets to functions or sporting events that have no relationship to our business ✗ Hospitality valued at more than £25, unless you have prior approval from the Director or Chairperson <p>YOU <u>MAY</u> ACCEPT HOSPITALITY IN THESE CIRCUMSTANCES</p> <p>Occasions linked with business where modest hospitality (up to £25) is offered, e.g.</p> <ul style="list-style-type: none"> ✓ Refreshments taken during business meetings and working lunches ✓ Representing us at events hosted by other social landlords or partner organisations, or at networking events open to others in the RSL or related sectors ✓ Representing us at events to mark awards, achievements or other significant milestones relevant to our business <p>HOSPITALITY WITH A VALUE OF £25 OR MORE</p> <ul style="list-style-type: none"> ✓ Politely decline the offer, unless you have received prior approval from the Director or Chairperson to accept it ✓ We may permit third party payment of travel and accommodation costs if a committee member or employee is invited to speak at a conference to promote GhHA and its achievements to wider audiences ✗ If you accept invitations outside working hours for drinks, meals, social events etc, you must pay your own way and be able to demonstrate that you have done so

DECLARING AND RECORDING OFFERS OF GIFTS OR HOSPITALITY

- **If you are offered any kind of gift or hospitality of any value**, you must tell your line manager or head of department (staff), or the Director or Chairperson (committee) – even if you did not accept the offer
- If you accept a gift or offer of hospitality that has a value of £25 or more, you must record this in the **Register**
- You should provide the following information: the **date of the offer** and **who made it**; a **description of the gift or hospitality** offered to you, including the **estimated value**; **whether you accepted or refused the offer**; and **any additional comments** (e.g. gift accepted but it was passed on to GhHA to donate to charity)
- You should send this information promptly to the **Corporate Services & HR Team**, and **copy it to** your head of department (staff), or to the Director or the Chairperson (committee)