

## **GIFTS AND HOSPITALITY POLICY 2024**

### **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 the Board of Management and staff.

### **2.0 GENERAL PRINCIPLES:**

Staff and Board Members 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 I will act, and ensure I am seen to act, wholly in the interests of our organisation, our tenants, other residents in our communities and other service users. I will ensure that I do not benefit improperly from my position.

A.2 I will 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 or influence or place me under an obligation to these individuals or organisations. I will comply with OVHA's Entitlements, Payments and Benefits Policy and Gifts and Hospitality Policy.

#### **4.0 EXCEPTIONS**

It is accepted that the work of staff and / or Board Members 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 (i.e. the Senior Management Team) or Board Members 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 Board Members 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 (with signature of staff or Board Member)
7. Whether the offer has been rejected (with signature of staff or Board Member)
8. Signed by Chief Executive/Company Secretary and by the Treasurer (or delegated Finance, Audit and Corporate Governance Committee member) annually.

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 Board of Management 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 Board 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.

Anne Smith  
Chief Executive

**22<sup>nd</sup> October 2024**

### **Policy Review and Consultation Process**

Reviewed by the Management Team	N/A
Reviewed by the Finance, Audit and Corporate Governance Committee	7 <sup>th</sup> November 2024
<b>APPROVED BY THE BOARD OF MANAGEMENT COMMITTEE</b>	<b>28<sup>th</sup> November 2024</b>
<b>Date of Next Review</b>	<b>October 2029</b>