

BELGRAVE NEIGHBOURHOOD CO-OPERATIVE HOUSING ASSOCIATION GIFTS AND HOSPITALITY POLICY

Aims of the gifts and hospitality policy

The following are aims of the gifts and hospitality policy:

- To ensure probity and integrity in relation to how the co-op operates
- To give clarity to committee members and staff working for the co-op regarding what gifts and hospitality can be received or offered

Delegated Authority

- 1 The co-op delegates authority to its Chief Executive Officer to take any relevant action in relation to the gifts and hospitality policy.

Policy statement

- 2 Committee Members and staff working on behalf of the co-op must never accept or offer any gifts and/or hospitality which might, or reasonably appear to, compromise their personal judgment or integrity or place them under an improper obligation.
- 3 It is not uncommon for gifts or hospitality to be offered and dealing with this can be a sensitive issue. Individuals should make a reasonable judgement about whether or not to accept gifts and/or hospitality based on the guiding principles in this policy.
- 4 No gifts and/or hospitality can be accepted if they are likely to affect the co-op's impartiality, create a potential conflict of interest or be thought to imply an obligation to the person or organisation offering it.

Gifts and hospitality – principles

- 5 Committee Members and staff should adhere to the following principles:
 - Gifts and or hospitality should generally not be accepted and should be politely declined;
 - Gifts and/or hospitality should never be canvassed;

- Gifts and/or hospitality should never be offered or accepted in respect of committee members seeking support from other committee members;
- If it will cause offence or returning it is impossible given the nature of the gift (e.g. flowers and other perishable goods), it can be accepted if it has only a modest value. Any gifts accepted must be handed to the Secretary so that decisions can be taken regarding what to do with it. The exception to this is where the gift is perishable, in which case if possible it should be shared amongst committee members and staff. All gifts accepted must be recorded in the Gifts and Hospitality Register;
- Any gift with an estimated value of £25 or more, or hospitality that is likely to exceed £100, must not be accepted without the express approval of the Chair or Chief Officer. Staff must seek their manager's approval before accepting hospitality that exceeds £50 but is less than £100. In exceptional circumstances, if seeking prior approval is not possible, staff must obtain retrospective approval as soon as practically possible. Committee Members should refer to the Chair or Chief Executive Officer;
- No gifts and/or hospitality of an extravagant nature can be accepted, for example concessionary rates, paid holidays, free travel, hotel accommodation, social events unless there is a clear business case justifying attendance of a social event;
- Working lunches, which could include drinks/meals for committee members/staff or with companies that the co-op does business with, may on occasions be considered appropriate. As a guideline, costs per head should not exceed £30 and there must be an obvious benefit for the co-op for the gifts/hospitality;
- In no circumstance should monetary gifts (including gift vouchers) ever be accepted;
- Gifts of a promotional nature, e.g. calendars and stationery, can be accepted;
- Gifts or hospitality of any level from a firm in the process of bidding or tendering for work, or about to do so, with the co-op would be unacceptable and must not be accepted;
- Invitations accepted on a personal basis in personal time should still be accepted or declined in accordance with the rules set out above;

- Any gifts and/or hospitality accepted or declined must be declared and recorded in the Gifts and Hospitality Register, kept by the Secretary;
 - Failure to comply with this Policy may result in code of conduct action being taken regarding committee members and disciplinary action regarding staff involved;
- 6 When a gift or hospitality is being declined, individuals should be courteous but draw the co-op's policy to the attention of the person making the offer.

Gifts from members

- 7 Gifts of money (including gift vouchers) from members should not be accepted. Other small gifts with a value of less than £10 may be accepted where refusal would cause offence. Wherever possible, such gifts should be shared with committee members and staff but must still be declared on the Gifts and Hospitality Register.
- 8 Offers of gifts/legacies under the wills of deceased residents must always be declared and refused.

Offering gifts and hospitality

- 9 As a general rule, there should be no need to offer any gifts other than small promotional gifts, e.g branded stationery, to any person or organisation.
- 10 There may be times when it will be appropriate for the co-op to extend hospitality. It is important to ensure that the co-op's practice is consistent with the rest of this policy and standards of probity (strong moral principles, honesty and decency) are maintained.
- 11 Hospitality should not be offered if it could be interpreted as an attempt to exert improper influence over others.
- 12 When hospitality is offered, the person offering it should be able to justify that the arrangements made are:
- In the interests of the co-op;

- Clearly linked with the business;
 - Consistent with the co-op's objectives;
 - Within budgetary limits.
- 13 Hospitality of an extravagant nature is highly inappropriate and must never be offered.
- 14 Working lunches, which could include drinks/meals for committee members/staff or with companies that the co-op does business with, may on occasions be considered appropriate. Those offering or receiving such hospitality should be able to justify:
- The benefit for the co-op in respect of the hospitality
 - Which committee members and/or staff were involved in the hospitality
 - That all committee members have been invited to any hospitality event that applied specifically to the committee
 - That as a guideline, costs per head should not exceed £30.
- 15 When extending hospitality of any nature, committee members and staff are reminded of the requirement to record this in the Gifts and Hospitality Register.
- 16 Committee members should obtain authorisation from the Chair or Chief Executive Officer before offering any hospitality. Staff should obtain authorisation from their line manager.