

Gifts & Hospitality Policy

1.0 Introduction

- 1.1 Southern Housing has adopted the NHF Code of Conduct (2022 Edition). The Code requires there are clear rules and procedures in relation to gifts, hospitality, and other probity matters.
- 1.2 This Policy clarifies responsibilities in relation to the giving and receiving of gifts and hospitality. It applies to all:
- Southern Housing colleagues (whether permanent, temporary, full-time or part-time)
 - Governance members (this includes board members, committee members, and resident governance members)
 - Agency staff, contractors, or other people/organisations representing Southern Housing and its subsidiaries
 - Those providing services under a contract or other agreement with Southern Housing.

For the purposes of this Policy, the term ‘individual’ or ‘you’ includes all those listed above. ‘Our’ or ‘we’ means Southern Housing.

- 1.3 The principle of integrity requires that no individual should place themselves under any obligation which might influence, or be perceived to influence, the conduct of their duties. This is an integral part of our values.
- 1.4 Failure to adhere to this Policy or the making of a false declaration could result in:
- Action in line with the Disciplinary Policy for colleagues and the Breach Procedure for Governance Members
 - Regulatory and/or legal sanctions
 - Serious damage to Southern Housing’s reputation and that of the wider social housing sector.
- 1.5 The Executive Team (ET) monitors the Gifts and Hospitality register and any breaches on a quarterly basis.
- 1.6 This Policy does not apply to items given to residents in return for, for example, completing a survey or compensation for service failure.

- 1.7 Southern Housing has one central Gifts and Hospitality register used to record gifts and hospitality. This register is available for inspection by the general public on request.

Colleagues are responsible for entering information onto this register. If they do not have access to the register, they must ensure the relevant information is provided to someone who can make the entry on their behalf e.g., line manager. The Governance Team or Resident Involvement Team will make entries for governance members.

- 1.8 No local registers must be kept.

2.0 Gifts

- 2.1 **The general principle is no gifts or items should be accepted from any source.**

This means:

- ✗ Individuals must not accept any gift that is delivered to them. They should return it with an explanatory letter or email and a reference to this Policy.
- ✗ Individuals must not accept cash or cash equivalent (e.g. vouchers)
- ✗ Individuals must not solicit gifts from third parties
- ✗ Contractors, potential contractors, and residents/service users must not be asked to contribute to personal collections for individuals.

- 2.2 Gifts received from contractors or suppliers may be seen as being influential to procurement decisions and could be considered an offence under the [Bribery Act 2010](#).

- 2.3 **Exceptions to the 'no gifts' rule (at 2.1 above) are:**

- ✓ A gift of perishable goods e.g., biscuits, chocolates, cake, flowers which cannot be returned. These must be declared on the Gifts and Hospitality register and shared with colleagues where practicable.
- ✓ Modest promotional items such as calendars, diaries, or pens. Individuals can keep these and don't need to declare them.
- ✓ Gifts must not be bought with our funds, except for small tokens for major events e.g., flowers for long term sickness or a funeral. The maximum value is £50 per individual. These must be declared on Gifts and Hospitality register.

- 2.4 On the very rare occasions, when non-perishable items cannot be returned, these must be donated for charitable purposes.

- 2.5 We must always thank the person sending the gift and inform them in writing what's happened with the gift, reminding them we have a 'no gift' policy.

3.0 Donations

- 3.1 We can ask third parties for donations under the following circumstances:
- ✓ Donations used for specific projects that benefit our residents. Examples are equipment and services for giving something back projects and resident bingo events at Southern Housing schemes.
 - ✓ Donations for organised charity events with an approved business case in place e.g., Charity golf day. All proceeds must be given to a registered charity. This would normally be a charity within Southern Housing like Fresh Visions.
 - ✓ Donations are part of the Social Value commitment formalised in Southern Housing partnership contracts.
- 3.2 Before individuals seek donations, they must be aware of any current or future procurement opportunities with the third party making the donations. We must not seek donations during a bidding process (e.g. tendering for contracts) or if the donation could be perceived as influencing the tendering process.
- 3.3 All donations must be recorded on the Gifts and Hospitality register.
- 3.4 Donations to individuals cannot be accepted.

4.0 Sponsorship

- 4.1 Southern Housing has charitable objectives and therefore corporate sponsorship isn't deemed appropriate. However, any opportunities will be considered by the Executive Team and would require their approval.
- 4.2 Individuals may request sponsorship from their colleagues for their own personal fundraising initiatives or for specific projects that benefit our residents. Our funds must not be used.

5.0 Business hospitality

- 5.1 Business hospitality can be given or accepted if:
- ✓ There is a direct link to a business benefit. This means there must be a genuine, transparent business benefit of the hospitality which can be demonstrated.
 - ✓ It cannot be perceived as influencing the recipient improperly
 - ✓ It is not given/received during or shortly prior to a bidding process e.g., tendering for contracts. Such hospitality may be seen as being influential to

procurement decisions and this could be considered an offence under the [Bribery Act 2010](#).

- ✓ In the case of sporting or cultural events, it is part of a networking group opportunity and there is a direct link to working arrangements. And a genuine, transparent business reason can be demonstrated.
- ✓ The host is present (otherwise it is a gift in which case the principles under [2.0](#) above apply)
- ✓ The value is less than £150 per person. This limit can be exceeded if attending events such as business-related awards ceremonies with the prior agreement of the relevant line manager.
- ✓ It is approved in advance of the event - failure to do so will be considered as a breach. Approval must be by the:
 - Relevant Director or Leadership Team member for colleagues
 - Relevant Executive Director for Leadership Team members
 - Chief Executive for Executive Directors
 - Director of Governance & Regulation for the Chief Executive.
- ✓ If individuals provide hospitality, the appropriate budget holder must approve this in advance.

5.2 If an individual wants to take their partner to a Southern Housing event or one organised by a third party, they require approval from their line manager.

- 5.3
- ✓ Governance members may accept business-related hospitality up to the value of £150 e.g. award ceremonies. The Director of Governance & Regulation must approve any hospitality of a value more than £150 per person in advance.
 - ✓ Board and Committee members must declare any hospitality, excluding that provided by Southern Housing, to the Director of Governance & Regulation for inclusion on the Gifts and Hospitality register
 - ✓ Resident governance members must declare hospitality, excluding that provided by Southern Housing, to the Resident Involvement Team for inclusion on the Gifts and Hospitality register.

- 5.4
- ✗ Individuals must not accept overnight stays paid for by a third party. Individuals must fund overnight stays themselves.
 - ✗ Individuals should not accept any hospitality over £500 per calendar year. The Executive Team must approve anything more than this amount.

- ✗ Individuals should never accept any hospitality that could be interpreted as a way of exerting an improper influence over their duties.
- ✗ Hospitality should not be accepted if we would not reciprocate in similar circumstances.
- ✗ Individuals must not actively solicit hospitality.
- ✗ Excessive hospitality should not be offered to others on behalf of Southern Housing. The timing of hospitality in relation to procurement or purchasing decisions is particularly sensitive.

6.0 Southern Housing corporate/social events

- 6.1 Southern Housing, at its discretion, may provide funding for social events for governance members and/or colleagues (e.g. Christmas parties) up to a limit of £150 per person, per event.
- 6.2 The Executive Team must approve all corporate events with a total cost of more than £5,000 in advance. The relevant director or manager in line with this Policy and the financial delegations will approve any events under this amount.

7.0 External events

- 7.1 When representing Southern Housing at external events, individuals are discouraged from taking part in activities such as prize draws, competitions, and raffles. On the rare occasion where this is unavoidable, individuals must return any prizes to the provider with an explanatory note.
- 7.2 Individuals don't need to declare meals, overnight stays, and refreshments supplied by the organisers as part of a training course or conference.
- 7.3 Individuals don't need to declare sandwich lunches, teas, and coffees provided by third parties at meetings.

8.0 Legacies

- 8.1
 - ✗ Individuals are not permitted to accept legacies from Southern Housing residents, clients, or service users, unless the recipient is related to the resident. This is a risk for Southern Housing and could have serious reputational and regulatory consequences.
 - ✗ We must inform any resident who makes it known they wish to leave a legacy to an individual this is not acceptable.

The individual's line manager must inform the Southern Housing resident, client, or service user in writing individuals are not permitted to accept personal

legacies, in line with this Policy. Failure to do so will be treated as a disciplinary offence under the Disciplinary Policy and could lead to dismissal.

- ✗ Individuals should not, under any circumstances, become involved in the decision-making process for legacies by any Southern Housing resident, client, or service user, unless directly related to them.
- ✗ Individuals are also barred from acting as an executor or power of attorney for any Southern Housing resident, client, or service user or their estate, unless directly related to them.

9.0 In summary

- 9.1
- ✓ If in doubt, speak to the Governance Team and your line manager.
 - ✓ Inform your line manager if you suspect you have been offered a gift or hospitality with corrupt intent.
 - ✓ Inform your line manager if you are concerned a colleague may have accepted any gift or hospitality that goes against this Policy (also see [Anti-Fraud, Bribery, Corruption & Thefts Policy](#), [Whistleblowing Policy](#), and the [Anti-Money Laundering Policy](#)).

10.0 Review

- 10.1 We'll review this Policy every two years to incorporate legislative, regulatory, best practice developments, or address operational issues.

Policy controls

Effective from	16 December 2022
Approved by	Shadow Board
Approval date	30 November 2022
Policy owner	Director of Governance & Regulation
Policy author	Alison Wignall, Director of Governance & Regulation (Optivo)

Version history		
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1.0	New policy	Alison Wignall, Director of Governance & Regulation (Optivo) Shadow Board