

## HOSPITALITY AND GIFTS POLICY



<b>Policy Title</b>	<b>Hospitality and Gifts Policy</b>		
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## 1. BACKGROUND AND PURPOSE

This information is intended to provide a clear process for recording all gifts and/or hospitality offered to, as well as those accepted by, employees (including Board Directors).

There is an increasing expectation that Council companies will be transparent, open and accountable in all their activities. The public must be satisfied that every effort is being made to limit the opportunity for favouritism, collusion or priority treatment.

Failure to declare a gift or hospitality could ultimately lead to disciplinary action or even criminal prosecution.

With the exceptions listed below, employees must refuse any personal gift offered to them by any person or body that has any significant financial or other business connection with Cornwall Housing. In monetary terms, this is any gift or combination of gifts valued at over £10. If employees are in any doubt, they must refer this to their line manager immediately.

Examples include contractors, outside suppliers, persons tendering for business etc.

Exceptions to this requirement are:

- a) A modest gift of a promotional nature given to a wide range of people, such as calendars, diaries and other articles which are of use in the office and can be considered to form part of the general mailings of a company
- b) A modest gift where refusal would cause needless offence and the giver is not seeking a business decision but merely wishes to express thanks for service, advice or co-operation received, for example a box of chocolates or a bottle of wine.

An employee must not on any occasion accept the offer of money from any organisation, person or person's estate that has or seeks dealings with Cornwall Housing.

At all times employees must consider if the gift is so significant that a member of the public may think that their judgment when dealing with the matter would be prejudiced by the gift.

Employees must only accept offers of hospitality valued at over £10 if there is a genuine need to impart information or represent Cornwall Housing in the community. Offers to attend purely social or sporting functions must only be accepted when these are part of the life of the community or where Cornwall Housing should be seen to be represented. Acceptance must be properly authorised in advance by the appropriate manager and recorded.



When hospitality has to be declined those making the offer must be courteously but firmly informed of the procedures and standards operating within Cornwall Housing. When receiving authorised hospitality, employees must be particularly sensitive as to its timing in relation to decisions which Cornwall Housing may be taking affecting those providing the hospitality.

Employees must record details of all gifts and/or hospitality offered, as well as those declined, by completing an Employee Declaration of Gifts and Hospitality form. If in doubt about the appropriateness of accepting particular offers, employees must refer to their line manager for further guidance.

Acceptance by employees of hospitality through attendance at relevant conferences and courses is acceptable where it is clear the hospitality is corporate rather than personal and where Cornwall Housing is satisfied that any purchasing decisions are not compromised. Where visits to potential contractors etc. are required, employees must ensure that Cornwall Housing meets the costs of such visits to avoid jeopardising the integrity of subsequent decisions.

The following are examples of unacceptable offers or invitations:

- Holidays, including accommodation and travel arrangements;
- Hotel vouchers, theatre tickets, free travel, etc;
- Use of a company flat or hotel suite; and
- Where the person or body offering the hospitality has a matter currently at issue or in dispute with Cornwall Housing.

Recent examples of gifts which have been declined include:

- Invitation from a contractor to all members of ELT and SLT to attend an event at a nightclub including free food and drinks.
- Invitation to an all expenses paid Christmas Party.

Recent examples of gifts which have been accepted include:

- Bottles of wine/chocolates which were then donated to the Christmas raffle.
- Gifts from residents by way of appreciation which are for a team.



## 2. PROCESS FOR DECLARAING GIFTS/HOSPITALITY

Where an employee:

- Receives a gift or hospitality of a value greater than £10 or in other cases where they consider it advisable to do so; or
- Refuses a gift or hospitality of a value greater than £10 or in other cases where they consider it advisable to do so

the employee must complete the Employee Declaration of Gifts and Hospitality form which must then be passed to the Head of Governance.

The Head of Governance must review all Employee Declaration of Gifts and Hospitality forms and arrange for the information to be recorded on the central register.

The Managing Director, Strategic Directors and Heads of Service must also complete an Employee Declaration of Gifts and Hospitality form which must be passed to the Head of Governance.

Gifts received and registered and what should be done with them will be determined by the Head of Governance and also entered in the Register.

## 3. SUMMARY

In summary, if a gift is received or hospitality is accepted, unless it is of a value of less than £10, it must be notified to the Head of Governance who must enter it on the Register.

Any gift or hospitality offered may be refused and, unless of a value of less than £10, the refusal must be notified and registered. Gifts received and registered and what should be done with them will be determined by the Head of Governance and also entered in the Register.

## 4. FURTHER ADVICE

Advice must be sought from the line manager, Head of Service, or Head of Governance if an employee is in any doubt as to the interpretation of this Code.



## 5. BREACHES AND NON-COMPLIANCE

Any instance of a breach of this policy which comes to Cornwall Housing's attention will be investigated and appropriate action taken. This may include action under Cornwall Housing's disciplinary procedures.



## APPENDIX A - PRIVATE AND CONFIDENTIAL

### REGISTER OF GIFTS AND HOSPITALITY

#### For Managing Director, Directors, Staff and Board Directors

This form should be completed with regard to any gifts or hospitality which need to be declared. An annual declaration will also be required, even as a nil return.

**Name:**

**Position Held:**

Declaration of any gifts received/refused and the value.	
How do you know the donor of the gift?	
Declaration of any hospitality received/refused and the value.	
Any other interests?	
Managing Director's Comments/Actions	

Signature:

Date:

Head of Governance, CHL

Date:

*Once completed, this form should be held by the Head of Governance.*



## DIVERSITY & INCLUSION

We are committed to treating all people with fairness and respect. We aim to create an inclusive environment where people are treated with dignity, inequalities are challenged, and we anticipate and respond positively to different needs and circumstances to enable individuals to achieve their potential and foster good relations within the communities we serve. We want to be recognised as an organisation delivering fair, inclusive, accessible services and an employer and partner of choice.

When applying this policy, we act sensitively towards the diverse needs of individuals and to reduce discrimination and harassment by making reasonable adjustments such as:

- eliminating discrimination – by providing support to those who need it and information in accessible formats and languages on request.
- tailoring the policy to meet both the specific needs of the individual, including those with additional support needs, and the diverse needs of the wider community
- advancing equality of opportunity – treating all tenants fairly
- fostering good relationships – listening to customers and responding appropriately
- compliant with all aspects of Equality & Diversity legislation, and specifically the Equality Act 2010.





## Contact us:

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## Alternative formats:

If you would like this information on audio CD, audio tape, Braille, large print, any other format or interpreted in a language other than English, please contact [info@cornwallhousing.org.uk](mailto:info@cornwallhousing.org.uk)

