Community Counts
Milnbank
Housing Association
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TO:	Management Committee
PREPARED BY:	Linda Sichi (Deputy CEO)
SUBJECT:	REVIEW GIFTS, HOSPITALITY & DONATION POLICY
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APPROVED BY:	Paul Martin (CEO)
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GIFTS, HOSPITALITY & DONATIONS POLICY

HAPPY TO TRANSLATE

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GIFTS, HOSPITALITY & DONATIONS POLICY

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1. MILNBANK HOUSING ASSOCIATION (MHA) STRATEGIC OBJECTIVES

MHA's mission is to provide excellent homes and services in a thriving community. We believe that people living in the MHA community should:

- Have warm, safe, and affordable homes, and receive excellent services from MHA.
- Live in neighbourhoods that are clean and well cared for, with real community pride.
- Have access to opportunities and services that promote a good quality of life.

2. MHA's VALUES

Working as 'One Milnbank' so that we offer the same quality of services, support and housing to all tenants and residents.

3. LEGAL & REGULATORY COMPLIANCE

The Management Committee leads and directs MHA to ensure good outcomes for its tenants and other service users. The Scottish Housing Regulator's Regulatory Financial & Regulatory Framework Standard 5 "The RSL conducts its affairs with honesty and integrity and, through the actions of the governing body and staff, upholds the good reputation of the RSL and the sector" and "Governing Body members and staff declare and manage openly and appropriately any conflicts of interest and ensure they do not benefit improperly from their position. MHA also adheres to all relevant legal employment requirements associated with this policy.

4. POLICY INTRODUCTION

The aim of the policy is to describe how Milnbank Housing Association (MHA) and its subsidiary company deals with offering gifts and hospitality on a corporate basis, making donations to good causes in the local community and on seeking donations to support our work. It also covers how the Management Committee (MC) Members and employees must deal with offers of gifts or hospitality by third parties.

5. PRINCIPLES OF THE GIFTS, HOSPIATLITY & DONATIONS POLICY

To protect MHA's good reputation, it is expected that everyone associated with us meets the highest standards of personal integrity and accountability, and to ensure responsible stewardship of MHA's income and resources.

MHA adopts 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. MHA will also set clear rules about

acceptance of gifts or hospitality from external parties by the MC and employees. The Associations rules will promote compliance with:

•All relevant legislation (e.g., charity law & anti-bribery legislation)
•All relevant regulatory standards (e.g., SHR's requirement that RSLs should conduct their affairs with honesty and integrity)
•MHA Codes of Conduct for the MC and employees.

6. GIFTS, HOSPITALITY & DONATIONS PROVIDED BY MHA

6.1 -Making Gifts - MHA will not normally make gifts to MC or employees, unless allowed for in this Policy, this may include the following circumstances:

•To mark occasions where a gesture of appreciation or sympathy is appropriate. (E.g., bereavement, serious illness).
•To make awards to employees to mark long service or retirement.

MHA may also offer a gift as a gesture of thanks to external visitors, (E.g., someone who has given up their time to perform a service or ceremony in support of our work).

The Chairperson and CEO will have delegated authority to approve gifts made by MHA valued at up to £70. Any proposal to make a gift valued above this will require MC approval. Gifts will be recorded in the Gifts, Hospitality and Donations Register unless the gift is "de minimis", i.e., the gift is not of significant value or material consequence. MHA define this as a gift valued at £70 or less.

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 Long Service & Retirement Statement (APPENDIX A).

MHA may lend computer equipment to a MC member to assist with their duties (E.g., electronic committee papers). The equipment will remain the property of MHA who will retain an appropriate declaration form signed by the MC member regarding this and agreeing to internet use policy.

6.2 - Providing Corporate Hospitality - From time to time, MHA may wish to commemorate or celebrate certain occasions or events. (E.g., reception or to promote MHA's objectives and achievements, opening of a new housing development or making a gesture of appreciation at Christmas for MC members' voluntary contribution during the year). On such occasions, MHA may pay for food and refreshments for those attending. MHA may also provide corporate hospitality for official business meetings, occasional business lunches and occasions when MHA has official visitors. The CEO will have delegated authority to approve any hospitality provided and will be responsible for ensuring that expenditure is proportionate and appropriate to the occasion. All hospitality provided will be recorded in the Register unless the value is "de minimis". MHA defines this as hospitality valued at less than £70 per head.

6.3 Donations - MHA considers specific requests for community and charitable donations and makes an annual allowance in the budget of up to £500 to cover this. Donations will only be made to non-profit making bodies, and the donation must not conflict with the aims and objectives of MHA. As MHA is a registered charity, we will ensure that any donations made are relevant to our own charitable purposes (E.g., the donation will result in a direct or indirect benefit to MHA residents or will contribute to the wider economic and social regeneration or well-being of the communities MHA serves).

We may occasionally seek donations from contractors or suppliers towards community events (e.g., gala day) or charitable causes supported by MHA. Any approach to contractors or suppliers must be authorised by a member of the management team and any donations received will be reported to the MC. All donations given or received will be recorded in the Register, irrespective of their value.

7. GIFTS OR HOSPITALITY OFFERED TO MC MEMBERS OR EMPLOYEES BY EXTERNAL PARTIES

7.1 What is acceptable and what is not - The general rule for MC and staff to accepting gifts or hospitality is, if in any doubt about whether to accept a gift or an offer of hospitality, politely refuse the offer or seek advice before accepting. The underlying principles are that MC and employees should:

- Comply with MHA 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 – 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 nature, or that could be seen by others as influencing your or MHA's decisions.
- Only accept gifts or hospitality on a personal basis where the Policy allows this and/or where it would be churlish or give offence to refuse.

7.2 Declaring and recording offers of gifts and hospitality - Any offers of gifts or hospitality by an external party, you must always:

- **(Employees)** Inform the line manager of the offer, and whether you accepted or declined it.
- **(MC members)** Inform the COE or Chairperson of the offer, and whether you accepted or declined it.

If a gift or hospitality offered by an external party exceeds £70 in value, the offer must be recorded in MHA's Register. Immediately after receiving any such offer, you must notify the Deputy CEO to record the following for the Register.

- *The date of the offer and who made it*
- *Description of the gift or hospitality offered, including the estimated value*
- *Whether you accepted or refused the offer*
- *Any additional comments (e.g., gift accepted but used to benefit the community or donated to charity*

The Register shall include details of gifts and hospitality provided by MHA, where the value exceeds £70 (gifts) or £70 per head (hospitality); and all donations made or received by MHA irrespective of value. The Register shall be available for public inspection.

8. CIRCUMSTANCES NOT ADDRESSED IN THE POLICY

While every attempt has been made to establish clear guidelines, other circumstances not covered by this Policy could arise. If this happens, MC and staff members should act in accordance with the spirit of the Policy and protect themselves and MHA's reputation for integrity. If in any doubt about whether to accept or refuse an offer of a gift or hospitality, the offer should always be refused, and guidance should be sought from the Chair, CEO or line manager.

9. EQUALITY & HUMAN RIGHTS

MHA's is committed to equal opportunities, and we will respond to the different needs and service requirements of individuals, and we will not discriminate against any individual for any reason outlined in Equality & Human Rights Legislation.

10. DATA COLLECTION

MHA will manage all personal data in accordance with our obligations under the GDPR regulations and the Association's Policy.

11. IMPLEMENTATION, COMPLIANCE & REVIEW

This policy will be promoted during induction and on an ongoing basis thereafter. The CEO will have overall responsibility for ensuring that the Policy is implemented effectively with the Deputy CEO having operational responsibility for maintaining the Register. Line managers also have responsibility for the specific actions described in the Policy.

Alleged breaches of the Policy will be fully investigated and may result in disciplinary action against MC or staff members. If MC members or employees have concerns about bribery, corrupt or inappropriate practice relating to gifts and hospitality, they should raise these under MHA's whistle blowing procedures. If any form of bribery or corruption is suspected, MHA will report matters to the Police and assist in any criminal investigations. Where required, MHA will also report the circumstances of any breaches or allegations to the SHR as a Notifiable Event.

As part of the policy review, the MC will receive an annual report on gifts and hospitality given and received and on donations made or received by MHA. The report will be compiled using the information entered in the Register of Payments, Benefits and Donations for the reporting period. The Association's Secretary will view the register annually.

The Gifts, Hospitality & Donations Policy will be reviewed every 2 years by the Management Committee, or as otherwise deemed necessary.

APPENDIX A

RETIREMENT & LONG SERVICE AWARDS

The Association recognises the contribution made by staff to the success of MHA. It is therefore felt appropriate to set down awards to be given when a long serving staff member is retiring or leaving the Association after reaching certain levels of service of full and continuous employment. The awards for long serving and retiring employees is agreed annually by EVH and currently are as follows:

Contribution to Retirement Leaving gift to mark long service
5 -10 years' service £116
10 – 15 years' service £145
15 – 20 years' service £203

The above arrangements will apply to all categories of staff regardless of grade.