



## Gifts and Hospitality Policy

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# Our Vision, Our Values, Our Strategic Objectives

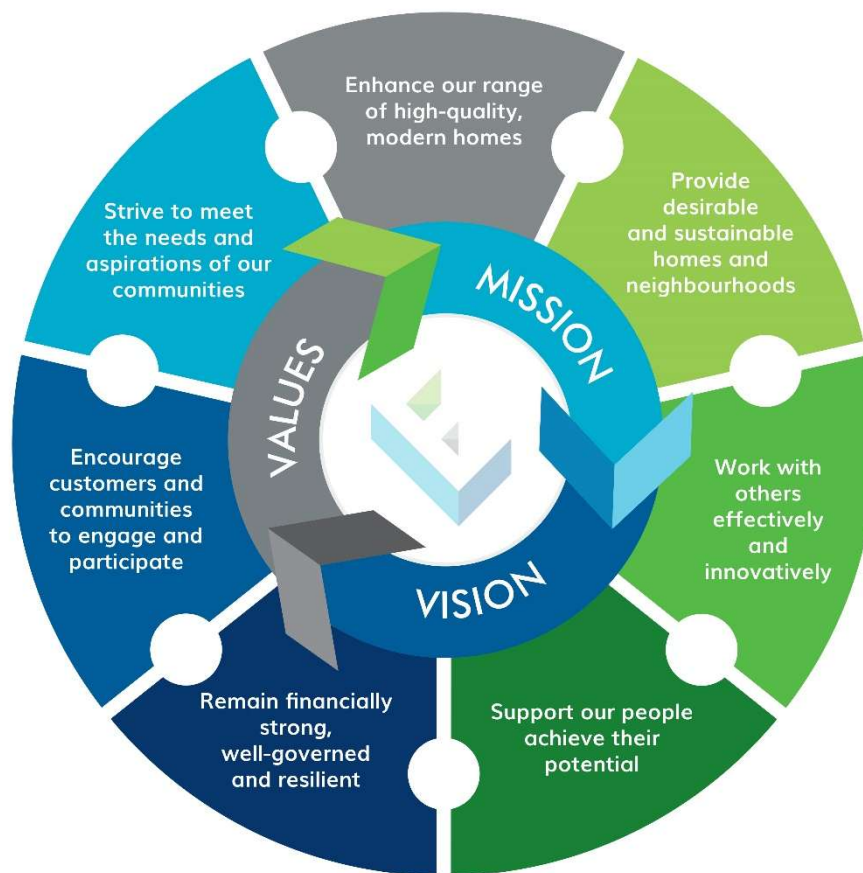
## Our Vision

A vibrant neighbourhood where everyone can prosper.

## Our Values

Caring, Reliable, Fair, Open and Adaptable

## Our Strategic Objectives



## Equality and Diversity Statement

Elderpark Housing are committed to ensuring people or communities do not face discrimination or social exclusion due to any of the following protected characteristics: age; disability; gender reassignment; marriage and civil partnership; pregnancy and maternity; race; religion and belief; sex or sexual orientation.

This document complies with our Equality and Diversity Policy.

We will regularly review this Policy and consider any equalities implications taking the necessary action to address any inequalities (either directly or indirectly) that result from the implementation of this Policy.

# Executive Summary

## Policy Author

The Chief Executive is responsible for the development of this Gifts and Hospitality Policy.

## Purpose of the Policy

The Gifts and Hospitality Policy provides guidance to employees of and the Management Committee on how offers of gifts and hospitality should be dealt with and the situations when the association may provide hospitality or gifts.

## Aims and Objectives of the Policy

The aims and objectives of this policy are to:

- Ensure compliance with the Regulatory Standards of Governance and Financial Management with particular attention to Standard 3 - The RSL manages its resources to ensure its financial well-being, while maintaining rents at a level that tenants can afford to pay and Standard 5 - The RSL conducts its affairs with honesty and integrity.
- Ensure that the Gifts and Hospitality policy is consistent with other current Elderpark Housing's Policies including our Entitlements, Payment and Benefits Policy, Code of Conduct for staff, Code of Conduct for Governing Body Members and Financial Regulations.

## Legislative and Regulatory Compliance

### **SHR Regulatory Standards**

Standard 3 - The RSL manages its resources to ensure its financial well-being and economic effectiveness.

Standard 5 - The RSL conducts its affairs with honesty and integrity.

### **Other Guidance**

SFHA Model Management Committee Members Guide

## Equalities

The policy outlines the approaches which can be taken in receipt or the provision of Gifts and Hospitality for both employees and Management Committee Members. It covers the whole organisation therefore there are no specific equalities issues within it.

## Privacy

This policy is made publicly available on our website and accessible for all.

## Related Policies

| Policy Title  | Location  |
|---|---|
| Equality, Diversity and Inclusion Policy                        | <a href="#">Equality, Diversity and Inclusion Policy</a>  |
| Entitlements, Payments and Benefits Policy                      | <a href="#">Entitlement, Payments and Benefits Policy</a>   |
| Whistleblowing Policy   | <a href="#">Whistleblowing Policy</a>   |
| Codes of Conduct for Employees and Management Committee Members | <a href="#">Code of Conduct - Employees</a><br><a href="#">Code of Conduct Management Committee</a> |
| Donations Policy  | <a href="#">Donations Policy</a>  |

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## 1.0 Introduction

- 1.1 Elderpark Housing seeks to always adhere to statutory obligations and regulatory standards of governance and financial management in everything we do. We seek to ensure that our tenants and members are satisfied that we have policies and procedures in place which are transparent, appropriate and accountable in relations to managing any offers of hospitality or gifts.
- 1.2 The association will occasionally provide Gifts and Hospitality together with being offered Gifts and Hospitality and these situations in themselves are commonplace within any work environment. As a Registered Charity and Housing Association who receives our income primarily from rents received from our tenants and residents any gifts and hospitality provided must be proportionate and any gifts and hospitality received must be transparent to ensure that there is no potential conflicts which could arise.
- 1.3 The following policy will outline the approach and principles the association uses when making any provisions in relations to gifts and hospitality for our people.

## 2.0 Purpose of the Policy

- 2.1 The purpose of the Gifts and Hospitality Policy is to articulate both the circumstances and monetary values which may be considered in relation to the provision of Gifts and Hospitality. Gifts differ from donations as they are usually made to individuals, in recognition of a personal effort/attribute, intended for the benefit of that individual.
- 2.2 Employee's and Management Committee Members of the Association have a duty to ensure responsibility for the organisations income which is mainly derived from tenants' rents.

The following principles govern the operation of this:

- Employees and Management Committee Members must never place themselves in a situation which might influence, or be perceived to influence, the carrying out of their duties in an open, honest and transparent manner.
- All offers of gifts of hospitality offered to employees and Management Committee Members should be treated with caution and should be refused if they are of significant nature or potentially could be perceived by others as having had an influence on the association's decisions.
- The Association will adopt a prudent approach to making gifts or hospitality to employees or Management Committee Members, or to third parties following the principles contained within the Entitlements, Payments and Benefits Policy.
- Employees or Management Committee Members should seek approval from the Management Committee before accepting any gifts or hospitality. Further clarification on appropriate levels is detailed within **Appendix 1**.

- 2.2 Employee's and Management Committee Members have a responsibility to ensure that any offers of gifts or hospitality are in line with our Entitlements, Payments and Benefits Policy which clearly stipulate the circumstances in which they may be permissible and how these should be noted and recorded.

### **3.0 Aims and Objectives**

- 3.1 The aims and objectives of this policy are to:
- Provide clear information on the Gifts and Hospitality that may occur within the association.
  - Ensure compliance with the Regulatory Standards of Governance and Financial Management with particular attention to Standard 3 - The RSL manages its resources to ensure its financial well-being, while maintaining rents at a level that tenants can afford to pay and Standard 5 - The RSL conducts its affairs with honesty and integrity.
  - Ensure that the Gifts and Hospitality policy is consistent with other current Elderpark Housing's Policies including our Entitlements, Payment and Benefits Policy, Donations Policy, Code of Conduct for staff, Code of Conduct for Governing Body Members and Financial Regulations.

### **4.0 Approach and Method**

- 4.1 Employees and Management Committee Members should treat with caution any offer of gift, favour or offer of hospitality which is made to them personally as this could potentially be perceived as improperly influencing or impairing the individual's decision making.
- 4.2 The Management Committee in its formal approval of the policy acknowledges that it accepts full responsibility for its implementation and will ensure it complies with the Entitlements, Payments and Benefits Policy. The Chief Executive will regularly review the policy to ensure it remains in line with and statutory guidance.
- 4.3 Day-to-day responsibility for the operation of this policy lies with the Chief Executive and Corporate Governance Manager who will be responsible for the implementation and administering of the policy and ensure appropriate systems and controls are in place to support the application of the policy. All employees have a responsibility to ensure that this policy is applied as instructed.

## 5.0 Provision of Gifts by the Association

- 5.1 The Association will not normally give gifts to Committee Members or employees, other than those circumstances outlined in **Appendix 1** which is taken from the association's Entitlements, Payments and Benefits Policy. In almost all instances any gifts provided by the association will not exceed a value of £60 as outlined within this Entitlements, Payments and Benefits guidance.
- 5.2 It is recognised that as a caring and supportive employer gifts of a small value may be, under the terms of this policy, be made to Committee Members or employees on certain exceptional occasions. For example, as mark of appreciation for an achievement, celebrate a milestone or convey the organisations sympathies and these will not exceed the value of £60.
- 5.3 We recognise that any giving of gifts to Committee Members or employees should generally approved by the Chief Executive and recorded within the Register of Gifts and Hospitality which is reported to the Management Committee on an annual basis.
- 5.4 Any awards to employees to mark long service and/or retirement will be consistent with the related guidance published by Employers in Voluntary Housing within their salary scales document produced annually. The current mechanism under our Terms and Conditions is that these long service awards are provided at the conclusion of an individual's employment with the association and not provided at the relevant milestones in their length of service with the association.
- 5.5 As an organisation Elderpark Housing supports the concept of voluntarism and the added value that a voluntary committee provides in ensuring that the organisation is governed effectively, there is appropriate challenge and scrutiny and that the primary focus is on meeting the needs of our tenants and residents. We therefore believe it to be right and correct that there will be occasions whereby it appropriate to recognise the contributions of those volunteers and provide a gift with a monetary value consistent with their length of time they have contributed to the Association.
- 5.6 Such gift will be to a maximum value of £100 and will be tiered based on the individual's number of year's contribution as a Management Committee Member.
- Up to five years there will be a provision to provide a gift to the value of £25
  - Over five years, there will be provision to a gift up to a maximum value of £100
- This should always be provided to the individual as a gift of goods and under no circumstances would a monetary payment be made to the individual.
- 5.7 All gifts given by the Association will be recorded in the Gifts and Hospitality Register. The date, details of the decision to grant the gift, description of the gift, its value, who it was given to and their position or connection with the organisation.



- 5.8 It shall be the responsibility of the Corporate Governance Manager to maintain the Register of Gifts and Hospitality and provide this to the Management Committee for review on an annual basis or earlier intervals if requested to do so.

## **6.0 Hospitality Provided by the Association**

- 6.1 Employees and Management Committee Members may attend events organised by the Association to celebrate site openings, customer events, planning days etc.
- 6.2 It is also permissible for our employees and Management Committee Members to attend events to mark awards, recognise achievements or celebrate other significant milestones relevant to our business. These types of events will include, but not limited to, sector wide award ceremonies, invitations to events held by other RSL's or partner organisations or attendance at an event where there is a direct linkage to the work and activities of the association.
- 6.3 The only circumstance which the Association is likely to provide hospitality to third parties would be:
- Business meeting when the Association has official visitors
  - Special or significant events such as site openings etc.
  - Usage of our facilities for an external organisation which would bring some general publicity and promotion to the association.
  - Events to provide customer participation and or another Association function.
- 6.4 Currently the association holds an annual informal event for employees and Management Committee Members which recognises their contribution over the year together with ensuring that there are positive relationships formed between those tasked with leading and directing the association and those who provide the day-to-day services. The cost of this should not exceed around £50 per individual and will allow for food, transport and small element of refreshments.

## **7.0 Receiving Gifts from External Bodies / Individuals**

- 7.1 Generally Management Committee members or employees should not accept personal gifts from consultants, contractors, tenants or any personal organisations with which they have a professional relationship.
- 7.2 Small gifts with a value of £25 or less are permissible in line with the guidance, however all gifts made to staff or Management Committee members regardless of value, must be recorded in the Gifts and Hospitality Register. It is not considered appropriate to accept more than one small gift from the same source within a 12 month period.
- 7.3 The Association's general policy is that Management Committee members or employees should avoid situations where a gift could be construed as having an undue influence on decision making. However small gifts offered by a satisfied customer as a token of appreciation and where refusal of such gift may have the potential to offend

are permitted.

- 7.4 Where small gifts are received, whether corporately or by an individual employee or Management Committee Member then they should be recorded in the Register of Gifts and Hospitality. The register should record its approximate value, who it was from and their connection to the organisation.
- 7.5 Wherever possible no individual gift should be accepted from an external source with a value which exceeds £25 and employees and Management Committee Members should refuse these gifts unless it was likely to cause offence or otherwise damage our reputation. On approval of the Chief Executive a gift above the £25 limit may be retained in the office and donated to suitable charity, form part of any fundraising activity or be used as a prize for any activities held with our membership or tenants and residents.

## **8.0 Receiving Hospitality from External Bodies / Individuals**

- 8.1 It is recognised that occasionally employees or Management Committee Members may be invited to attend some forms of hospitality. Any hospitality must be approved by the Chief Executive prior to attendance to ensure it is compatible with Elderpark Housing's objectives, doesn't represent any conflict of interest and complies with our Entitlements, Payments and Benefits Policy.
- 8.2 Once approved, acceptance of hospitality is permitted for employees or Committee Members up to a value of approximately £60 and must be recorded in the Entitlements, Payments and Benefits register, along with an estimation of the value of hospitality received and how the hospitality links with our aims and objectives within five days of attendance and reported to the Management Committee for review at regular agreed intervals. Opportunities for hospitality valued at over £60 per person, such as awards ceremonies, will be co-ordinated by the CEO to ensure fairness and equality of opportunity for all staff.
- 8.3 It is recognised that the likelihood of any small offers of hospitality by external organisations, partners the association works with or local community groups is unlikely to place any undue influence on how the association manages its activities and there will be occasions when acceptance of the hospitality may be beneficial to develop our business. The association is clear that where there is specific merit in accepting an offer of hospitality the employee or Management Committee will not be precluded from doing so and this will be recorded within the Register of Gifts and Hospitality with the rationale for acceptance outlined and approved.

## **9.0 Donations**

- 5.1 The Association has a separate Donations Policy which outlines our procedures and criteria for providing donations.
- 5.2 Occasionally our employees or Management Committee Members may seek donations from our contractors / suppliers when fundraising for charity or to provide

prizes at an event held by the association. Approval for approaching our consultants, contractors or suppliers must initially be provided by our Chief Executive before this can take place. All donations received should be recorded within the relevant register.

## **10.0 Breaches of this Policy**

- 10.1 Any alleged breach of this policy should be reported to the Chair and / or Chief Executive in the first instance and this will be dealt with according to the protocol for a breach of the Code of Conduct for employees or Committee Members.
- 10.2 Any case involving such breaches will be subject to investigation using either the disciplinary procedures for employees or the Code of Conduct for Management Committee Members. The outcome will be reported to the Management Committee which will decide what further action may be necessary under the terms of related policies.

## **11.0 Monitoring of the Policy**

- 11.1 All gifts and hospitality should be recorded in a gifts or hospitality receipt form, and these will be monitored by the Corporate Governance Manager and Chief Executive and reported to the Management Committee annually (normally at the end of the financial year) or more frequently at the request of the Management Committee.
- 11.2 The report will include information on each of the gifts received, the recipient and the assumed value of the gifts. It will also outline the total value of gifts and how these were distributed within the organisation, if applicable.
- 11.3 The report will also provide an opportunity to review the policy and ensure that the minimum and maximum value for any gifts and hospitality given or received remains appropriate to the organisation.
- 11.4 Every effort has been made to ensure this policy provides guidance on the main issues that arise when making or taking gifts or hospitality. If a circumstance arises that is not covered by the policy, the decision should be made in line with the spirit, purpose and aims of this policy, and under the guidance of the CEO.

## **12.0 Complaints and Appeals**

- 12.1 Elderpark Housing's Management Committee have the right to appeal any decisions made on matters covered by this Policy according to the Association's Grievance Policy and Procedures/Standing orders/Rules etc.
- 12.2 Should any employee, Management Committee Member, external individual or service user wish to complain about this policy in either its content or implementation this can be done by raising it with the Governance and Compliance Manager, the Chief Executive or the Chairperson who will use the appropriate policy mechanism to investigate and determine the appropriate policy to use, for example Complaints Policy, Whistleblowing Policy, Code of Conduct etc.

### **13.0 Review of the Policy**

- 13.1 This policy will be reviewed every 5 years, with the next review being due in January 2026.
- 13.2 An interim review may take place in the event of changes to good practice, or regulatory requirements.
- 13.3 Any awards to employees to mark long service and/or retirement will be consistent with the related guidance published by Employers in Voluntary Housing salary scales which will be updated on annual basis.

## Appendix 1 - Entitlements, Payments and Benefits

| GIFTS AND HOSPITALITY                            |                                    |  |
|--|------------------------------------|--|
| Gifts received from tenants and external sources | Yes (not exceeding a value of £60) | <p>Small gifts (e.g. a box of chocolates, pens, folders, paperweights, flowers) can be accepted if:</p> <ul style="list-style-type: none"> <li>the cumulative value of gifts received from the same source in a 12-month period does not exceed £60</li> <li>you do not receive more than two such gifts from the same source in a 12-month period</li> <li>you record receipt of the gift(s) in the register</li> </ul> <p>You should not normally accept other gifts and should decline any gifts with a value of more than £60 unless to do so would cause offence or otherwise damage our reputation. In these cases, you must:</p> <ul style="list-style-type: none"> <li>Advise the donor that the gift will be donated to charity or will form part of our annual charity fund raising activities</li> <li>Record the gift and the action taken in the register within five days</li> </ul> <p>You should not regularly accept gifts from the same source and never more than twice from the same source within a 12-month period. The total cumulative value of gifts received from the same source over the course of a year must never exceed £60.</p> <p>You should also record any offers that you decline and the reasons for this, in the register within five days.</p> |

|   |  |  |
|---|--|--|
| <p>Gifts given from us to one of our people or received by one of our people from external sources to mark special occasions.</p> | <p>Yes (not exceeding a value of £100)</p>     | <p>Gifts from the organisation to our people can be permitted in cases where it is to mark a special occasion or significant events including:</p> <ul style="list-style-type: none"> <li>• Family events (e.g. marriage, milestone birthday, birth of a child),</li> <li>• Retirement</li> <li>• Leaving the organisation</li> </ul> <p>These must be recorded in the relevant register, and the value of such gifts will not normally exceed £100.</p> <p>Please note, that this does not include collections by our people using their own personal funds to mark special occasions. These are always permitted with no requirement to declare. For staff, contractual terms may be in place that dictate the value of any gift upon retirement/long service.</p> |
| <p>Hospitality associated with our business and that of its partners</p>  | <p>Yes (when not exceeding a value of £60)</p> | <p>Modest hospitality, such as a sandwich lunch or networking event, is permitted and does not need to be recorded</p> <p>All other hospitality up to a value of £60 is permitted but must be recorded in the register, along with an estimation of the value of hospitality received, within five days of attendance.</p> <p><b>You should not accept invitations with a value that is greater than £60, unless you have prior approval from the Chief Executive who will consider the merit in line with the policy. The type of hospitality offered will also be taken into consideration, e.g. we will not normally accept invitations to sporting events, concerts, golf tournaments etc.</b></p>   |

|  |     |   |
|--|-----|---|
|  |     | In this case, the reason for acceptance must also be included in the register and countersigned by the Chief Executive, or in the event this hospitality is for the Chief executive the Governance and Compliance Manager will countersign.   |
| Our people seeking donations from our contractors/suppliers when fundraising for charity | Yes | <p>This is permitted provided:</p> <ul style="list-style-type: none"> <li>• Approval is gained from Chief Executive] prior to making any approach</li> <li>• Any donations received are recorded in the register</li> </ul> <p>We recognise our social responsibility and promote charity fundraising by the organisation and our people. We have a separate policy that sets out our approach to supporting other charities.</p> |

## Appendix 2.

### Equality Impact Assessment

|  |   |  |                      |
|--|---|--|----------------------|
| <b>Name of Policy to be assessed</b>   | Gifts and Hospitality Policy  | <b>New policy or revision of existing?</b> | Revision of Existing |
| <b>Person(s) responsible for assessment</b>  |   | Chief Executive                            |                      |
| <b>1. Briefly describe the aims, objectives and purpose of the policy.</b>                           | The policy sets out how the association will manage the provision or offer of gifts and hospitality to our employees or Management Committee members. It aims to ensure compliance with our Entitlements, Payments and Benefits Policy and provide a clear process for how the process will be administered.  |  |                      |
| <b>2. Who is intended to benefit from the policy? (e.g. applicants, tenants, staff, contractors)</b> | The policy recognises that on occasions the association will make provision of gifts and hospitality to our employees and Management Committee Members. It also appreciates that there will be occasions whereby external organisations or individuals may offer a gift or hospitality therefore the main beneficiaries of this policy would be employees and Management Committee Members. |  |                      |

|   |  |                                       |                                |
|---|--|---------------------------------------|--------------------------------|
| <b>3. What outcomes are wanted from this policy? (e.g. the measurable changes or benefits to members/ tenants / staff)</b>  | The policy primarily ensures that the association is transparent about how it seeks to provide or manage offers of gifts and hospitality for our employees and Management Committee Members. |                                       |                                |
| <b>4. Which groups could be affected by the policy? (note all that apply)</b>   |  |                                       |                                |
| <b>Age</b>  | X  | <b>Disability</b>                     | X                              |
| <b>Gender reassignment</b>  | X  | <b>Marriage and Civil Partnership</b> | X                              |
| <b>Pregnancy and Maternity</b>  | X  | <b>Race</b>                           | X                              |
| <b>Religion or Belief</b>   | X  | <b>Sex</b>                            | X                              |
| <b>Sexual Orientation</b>   | X  |                                       |                                |
| <b>5. If the policy is not relevant to any of the equality groups listed above, state why and end the process here.</b>   |  |                                       |                                |
|   |  |                                       |                                |
| <b>6. Have those affected by the policy / decision been involved?</b>   |  |                                       |                                |
| The Gifts and Hospitality Policy has been developed in line with the relevant guidance and does not require any formal consultation process.  |  |                                       |                                |
| <b>7. Describe the likely positive or negative impact(s) that the policy could have on the groups identified above.</b>   | <b>Positive Impact(s)</b>  |                                       | <b>Negative Impact(s)</b>      |
|   | Limit the risk of accepting or providing gifts and hospitality   |                                       | No negative impacts identified |
| <b>8. What actions are required to address the impacts arising from this assessment? (This might include additional data, putting monitoring in place, making adjustments, taking specific action to mitigate any potentially negative impacts)</b> | No particular actions required.  |                                       |                                |

|         |                               |
|---------|-------------------------------|
| Signed: | Gary Dalziel                  |
| Dated:  | 19 <sup>th</sup> January 2026 |



Appendix 3.

GDPR Impact Assessment

|   |  |  |                                |
|---|--|--|--------------------------------|
| <b>Name of Policy to be assessed</b>  | Donations Policy   | <b>New policy or revision of existing?</b> | Revision of Existing           |
| <b>Person(s) responsible for assessment</b>   |  | Chief Executive                            |                                |
| <b>1. Briefly describe the aims, objectives and purpose of the policy.</b>  | The policy sets out how the association will manage the provision or offer of gifts and hospitality to our employees or Management Committee members. It aims to ensure compliance with our Entitlements, Payments and Benefits Policy and provide a clear process for how the process will be administered. |  |                                |
| <b>2. Which type of data will be used by implementation of this policy? (e.g. personal, sensitive or special category)</b>                  | The implementation and operation of the Gifts and Hospitality Policy with require the names and other contact details for those offering or receiving gifts to be recorded.  |  |                                |
| <b>3. What outcomes are wanted from this policy? (e.g. necessary to meet legal obligations)</b>   | Ensuring a transparent process for the provision or receipt of gifts and hospitality for our employees and Management Committee Members.   |  |                                |
| <b>4. Which groups could be affected by the policy? (note all that apply)</b>   |  |  |                                |
| <b>Tenants</b>  | X (where they offer gifts)   | <b>Committee</b>                           | X                              |
| <b>Employees</b>  | X  | <b>Contractors</b>                         | X (where they offer gifts)     |
| <b>If the policy is not relevant to any of the data groups listed above, state why and end the process here.</b>                            |  |  |                                |
| This policy is about the processes applied for our employees and Management Committee Members receiving or providing gifts and hospitality. |  |  |                                |
| <b>5. Have those affected by the policy / decision been involved?</b>   |  |  |                                |
| No  |  |  |                                |
| <b>6. Describe the likely positive or negative impact(s) that the policy could have on the groups identified above.</b>                     | <b>Positive Impact(s)</b>  |  | <b>Negative Impact(s)</b>      |
|   | Limit the risk of accepting or providing gifts and hospitality   |  | No negative impacts identified |
| <b>7. What actions are required to address the impacts arising from this assessment? (This</b>  |  | No particular actions required.            |                                |

|  |  |
|--|--|
| might include additional data, putting monitoring in place, making adjustments, taking specific action to mitigate any potentially negative impacts) |  |
|--|--|

|         |                               |
|---------|-------------------------------|
| Signed: | Gary Dalziel                  |
| Dated:  | 19 <sup>th</sup> January 2026 |

Last Review:

Next Review:

Policy Number: leave blank