

Gifts, Hospitality and Charitable Giving Policy

Originator:	Policy and Strategy Team
Executive Management Team Approval Date:	November 2019
Review date:	November 2020

1	Introduction
1.1	One Vision Housing (OVH) is committed to honesty, openness and accountability in the conduct of all business activities. This includes having a clear and consistently applied approach to the giving and receiving of ‘gifts and hospitality’ and charitable donations.
1.2	This Policy sets out the measures OVH will have in place to ensure all of its staff and Board Members act with integrity and follow defined procedures in the giving and receiving of gifts and hospitality. The Policy also sets out the rules and procedures that are applied in the use and control of ‘Procurement Cards’ to ensure probity in all financial transactions.
1.3	OVH, recognises the value and added confidence that having ethical standards in place can bring in the relationships it has with clients, customers and business partners.
1.4	<p>To deliver this added value and as a matter of good practice, OVH will expect all employees and Board Members to be mindful of the ‘7 Principals of Public Life’ in all conduct and activity associated with the running of OVH business activities. OVH have interpreted these principles as follows:</p> <ul style="list-style-type: none"> • Selflessness – OVH employees and Board Members should take decisions solely in the interests of OVH business activities, in line with the ‘vision’ and ‘corporate principals’. They should not do so in order to gain financial or other material benefit for themselves, their family or their friends • Integrity – OVH employees and Board Members should not place themselves under any financial or other obligation to outside individuals or organisations that might unduly influence them in the conduct of OVH business activities, including the giving and receiving of undeclared gifts and hospitality • Objectivity – In carrying out OVH business activities including recruitment appointments, awarding contracts and in the provision of services, all decisions should be made on merit • Accountability – OVH will put in place scrutiny arrangements appropriate to its business activities • Openness – OVH will record the reasons behind all major business decisions and will make this information available on request when it is appropriate to do so • Honesty – OVH will ensure employees and Board members declare any outside interests that conflict with OVH business interests

- Leadership – the Board and Executive Management Teams of OVH will lead by example and give their backing to all procedures designed to promote financial probity

1.5 **Access and Communication**

1.5.1 OVH is committed to ensuring that its services are accessible to everyone. OVH will seek alternative methods of access and service delivery where barriers, perceived or real may exist, that may make it difficult for people to work for OVH or use its services.

1.6 **Equality, Diversity and Human Rights**

1.6.1 OVH is committed to ensuring that no person or group of persons will be treated less favourably than another person or group of persons and will carry out our duty with positive regard for the following core strands of equality; Age, Disability, Gender, Race, Transgender, Sexual Orientation, Religion and/or Belief, Marriage and Civil Partnership, Pregnancy and Maternity.

1.6.2 OVH also recognises that some people experience disadvantage due to their socio economic circumstances, employment status, class, appearance, responsibility for dependants, unrelated criminal activities, being HIV positive or with AIDS, or any other matter which causes a person to be treated with injustice.

1.6.3 OVH will also ensure that all services and actions are delivered within the context of current Human Rights legislation. OVH will ensure its staff and others with whom we work, will adhere to the central principles of the Human Rights Act (1998).

1.7 **Complying with the Money Laundering Regulations 2017**

1.7.1 OVH will ensure there is a designated person on the Board of Management that has responsibility for ensuring compliance with the Money Laundering Regulations 2017 and that they have received appropriate training and guidance to fulfil this role effectively.

1.7.2 The designated Board member will seek assurance that OVH has appropriate procedures in place to check the provenance of any large payments that are received or offered in relation to OVH financial transactions. This will apply especially where customers or third parties have difficulties in explaining the origins of the finances and will make appropriate alerts in conjunction with the Money Laundering Reporting Officer, as required. For full details see the OVH Anti-Fraud, Corruption and Money Laundering Policy.

1.7.3 This Policy should be read in conjunction with the following:

- OVH Staff Handbook
- OVH Confidential Reporting (Whistleblowing) Policy
- OVH Anti –Fraud, Corruption and Money Laundering Policy
- Group Corporate Governance Framework for Community Benefit Societies
- National Housing Federation (NHF) Code of Conduct (applies to both staff & Board members)

2	Statement of Intent
2.1	<p>In operating this Policy, OVH aims to promote high standards of probity in all of its business activities. It does this to:</p> <ul style="list-style-type: none"> • Maintain the established reputation as a good company to do business with • Ensure that services it provides are accessible and are delivered in an equitable manner, without favouritism or preferential treatment • Ensure that goods and services it procures deliver value for money and are secured competitively without undue bias or influence • Ensure that partners OVH chooses to work with understand OVH's expectations in normal business relations and transactions • Protect staff and Board members from allegations of impropriety in financial dealings
2.2	<p>OVH will ensure all staff and Board members are aware of and abide by this Policy and the procedures that underpin it by:</p> <ul style="list-style-type: none"> • Inclusion within the staff / Board induction programme • Easy access to the Policy and procedure documents through the document management systems and Intranet • Inclusion within the OVH 'Staff Handbook' and 'Governance Framework' • Through the annual Declaration of Interests statements and completion of Probity Forms, where applicable
2.3	<p>Similar to the approach outlined in the 'OVH Anti-Fraud, Corruption and Money Laundering Policy', OVH will take a zero tolerance approach and may instigate disciplinary measures for any staff or Board member that is found to have:</p> <ul style="list-style-type: none"> • Solicited gifts and or hospitality for personal gain • Has failed to declare gifts or hospitality received (outside of tolerance levels) • Has offered gifts or hospitality without appropriate management approval • Used procurement cards inappropriately
2.4	<p>OVH will investigate thoroughly any allegations made against staff or Board members for any of the above breaches of this Policy, including those reported via the OVH Confidential Reporting (Whistleblowing) Policy.</p>
2.5	<p>OVH accepts that it may on occasion be appropriate for the giving and or receiving of hospitality as a normal part of business relations. OVH will, therefore, sanction this type of activity provided it is declared, can be justified on legitimate business grounds and where possible approved in advance by the appropriate Director (or equivalent).</p>
3	Policy
3.1	Gifts
3.1.1	<p>All gifts no matter what their nature or monetary value, whether accepted or rejected should be declared to the Group Governance Team for inclusion in the Gifts and Hospitality Register. All entries in the Gifts and Hospitality Register will need to include details of:</p>

	<ul style="list-style-type: none"> • The date and time that the offer of a gift or hospitality was made • The person or entity that offered the gift or hospitality • The reason (or perceived reason) why the gift or hospitality was offered • A description of the gifts or hospitality received or offered • In the case of gifts, an estimation of the cash value <p>3.1.2 OVH’s general principal in relation to gifts is that they should not be given or received as per Housing and Regeneration Act. There are, however, occasions when exceptions to this rule will be permitted. These include:</p> <ul style="list-style-type: none"> • In receiving gifts <ul style="list-style-type: none"> ○ Small tokens of appreciation for services provided or a job well done, where it would cause offence to those offering the gift to refuse ○ Where accepted, small gifts, in particular those of a perishable nature e.g. sweets and chocolates will be shared amongst colleagues or donated for charitable / community causes e.g. as raffle prizes for community fund raising activities • In giving of gifts <ul style="list-style-type: none"> ○ Only modest items with a limited cash value are to be offered as gifts and should not be offered as a means of securing new business / contracts or in exchange for any form of personal gain <p>3.1.3 OVH will not allow the giving or receiving of ‘cash’ gifts at any time regardless of the amount. If staff or board members are offered cash gifts at any time in connection with their work for OVH, they should politely refuse and should ensure the offer is recorded in the Gifts and Hospitality Register.</p> <p>3.1.4 The Gifts and Hospitality Register will be maintained by the Group Governance Team and will be signed-off by the Company Secretary. The Group Governance Team will also make copies of the signed-off register available to Internal Audit.</p>
<p>3.2</p> <p>3.2.1</p> <p>3.2.2</p> <p>3.2.3</p> <p>3.2.4</p>	<p>Hospitality</p> <p>As a general rule all hospitality whether given or received, accepted or rejected should be declared to the Group Governance Team for inclusion in the Gifts and Hospitality Register. Each declaration will be considered on its own merit by the Governance Team.</p> <p>OVH understands that the giving and receiving of modest forms of hospitality is part and parcel of normal business relations, can promote a cordial and conducive environment in which to conduct business and is not offered as a form of inducement in any way. Examples of hospitality of this nature include modest catering for guests when attending meetings and events.</p> <p>Where modest hospitality is offered or received and this is given universally to all attendees of a meeting or event there will be no need to make declarations. Where more lavish forms of catering are offered, in particular where alcoholic drinks are served, these will need to be declared on all occasions.</p> <p>Staff and Board members are advised to use their discretion and judgement when attending external events and if in doubt should always contact the Group Governance Team for advice</p>

	<p>on making declarations, preferably in advance, where it is known this type of hospitality will be offered and always after an event for updating of the Gifts and Hospitality Register.</p> <p>3.2.5 Where it is known in advance that hospitality of this nature is to be offered, approval should be obtained as follows:</p> <ul style="list-style-type: none"> • For staff – in the first instance from line managers and then, in turn, from appropriate Operational Director or Head of Service • For Board Members – from the Company Secretary and/or then declared at the subsequent board meeting <p>3.2.6 Other corporate forms of hospitality will be permitted on a case by case basis e.g. attendance at sporting events but only where this is offered as a means of getting to know existing clients better and developing partnership arrangements. Tickets for this type of event should not be accepted if the person / entity offering the hospitality is not going to be present.</p> <p>3.2.7 This type of hospitality will not be permitted with prospective clients or business partners where contracts are being sought or offered and where this type of hospitality could be seen to unduly influence selection procedures.</p> <p>3.2.8 When attending events on official OVH business, where hospitality is given or received, staff and Board Members should on all occasions act appropriately to maintain the good reputation of the Group.</p>
<p>3.3</p> <p>3.3.1</p> <p>3.3.2</p> <p>3.3.3</p> <p>3.3.4</p>	<p>Procurement Cards</p> <p>In order to empower staff to take control of expenditure within their business /service areas, improve efficiency and realise value for money savings, OVH operates a system of ‘procurement cards’ for approved spending within agreed limits for designated officers.</p> <p>Where the need for a procurement card is identified for a member of staff, the Line Manager will need to submit a request form for approval by an appropriate Director for the service / business area.</p> <p>Approved cardholders will then be able to purchase work related goods and services using their procurement cards up to pre-agreed spending limits. Procurement cards must NOT be used for personal benefit or purchases at any time.</p> <p>In order to maintain close control on all procurement card expenditure, including that which may be classed as gifts and hospitality, OVH will operate the following procedures:</p> <ul style="list-style-type: none"> • Staff using procurement cards should obtain VAT receipts (wherever possible) for all card expenditure • Staff using procurement cards must update the Smart Data OnLine (SDOL) system before the 1st of each month recording a narrative for each transaction, linking scanned copies of receipts against expenditure items and indicating any spend classed as gifts and hospitality • Staff using procurement cards must forward a printed copy of the transaction record for the period for approval to the immediate Line Manager / Director as appropriate

	<ul style="list-style-type: none"> • The Approving Line Manager / Director will forward a copy of any transaction records that indicate expenditure on gifts and hospitality to the Group Governance Team for cross reference with the Gifts and Hospitality Register and send all approved copies of expenditure to the Accounts Payable Team • Once a quarter the Accounts Payable Team will also forward a random sample of approved expenditure to the Group Governance Team for cross reference against the Gifts and Hospitality Register as a further audit check
3.3.5	Any misuse of procurement cards will be investigated and may be classed as a disciplinary matter via the OVH Disciplinary Policy and could ultimately lead to termination of employment.
3.4	Charitable Donations
3.4.1	With a firm commitment to corporate social responsibility across OVH, staff and Board Members regularly engage in charitable activities in or outside the workplace that are organised by OVH.
3.4.2	To ensure probity in the selection of charitable courses that stand to benefit from OVH fundraising activities, all decisions on pooled donations will be made by the Staff Group.
3.4.3	The Staff Group will also contribute to the selection of charitable days and events throughout the year that OVH staff will participate in (usually national events for example, Children In Need, Sport Relief etc.).
3.4.4	Across the Group there are also a range of activities and ways in which OVH makes an active contribution to 'putting something back' into the communities in which it operates.
3.4.5	This includes facilitation of staff volunteering opportunities through to the administration of Community Development Funding. In all instances OVH will ensure beneficiaries of this type activity contribute to the achievement of corporate objectives and there are no personal benefits to staff or Board Members for beneficiaries selected.
4	Implementation
4.1	All OVH Staff and Board Members have a duty to abide by the provisions set out in the OVH Gifts, Hospitality and Charitable Giving Policy.
4.2	The Group Governance Team will have specific responsibility for maintaining the Gifts and Hospitality Register and for producing reports to the Group Business Assurance Committee, Executive Management Team, and Boards as required.
5	Performance
5.1	The Group Governance Team will produce a quarterly report of all declarations within the Gifts and Hospitality Register signed-off by the Company Secretary.
5.2	In relation to Board Members, a similar report will be produced by the Group Governance Team for sign-off by the Board at the next available meeting.

5.3	The Group Governance Team will make the Gifts and Hospitality Register available for scrutiny by internal or external audit at any time or if requested by any regulatory bodies.		
6	Consultation		
6.1	All OVH staff and Board Members have been consulted in the development of this Policy.		
7	Review		
7.1	The Policy will be reviewed annually on or as near as possible to the date of approval by the Executive Management Team (EMT). The Policy will be reviewed sooner in the light of any changes in legislation and/or any Government Framework in regard to gifts and hospitality, a change in OVH business practices or any system audits.		
8	Equality Impact Assessment		
8.1	Was a full Equality Impact Assessment (EIA) required?	No	
8.2	When was EIA conducted and by who?	An EIA Relevance Test conducted by the Governance Manager and the Policy and Strategy Manager on 15-05-2014 is still relevant for this Policy review.	
8.3	Results of EIA	The EIA Relevance Test did not identify any differential or adverse impacts for any group with protected characteristics as a result of the operation of this Policy.	
9	Scheme of Delegation		
9.1	Responsible committee for approving and monitoring implementation of the policy and any amendments to it	EMT	
9.2	Responsible officer for formulating policy and reporting to committee on its effective implementation	Group Director –Governance and Compliance	
9.3	Responsible officer for formulating, reviewing and monitoring implementation of procedures	Group Director –Governance and Compliance	
10	Amendment Log		
Date of revision:	Reason for revision:	Consultation record:	Record of amendments:

9 th October 2018	In line with the Review Schedule	See Section 6 above	There are no significant changes to the Policy in this review.
05/11/2019	In line with the Review Schedule	See Section 6 above	There are no significant changes to the Policy in this review.