



Gifts and Hospitality Policy






1.0 Introduction

- 1.1 The Gifts and Hospitality policy aims to protect the reputation of Housing Plus Group ‘the Group’ and guards against the risk of allegations of impropriety by members or staff, however they may be contracted with the Group, by clarifying and setting out what is and isn’t acceptable in relation to the giving and / or receiving of gifts and hospitality.
- 1.2 The RSH’s Regulatory Standards and the NHF’s Code of Governance require accountability and openness in order to protect the reputation of the organisation and the sector as a whole.
- 1.3 The RSH’s Governance and Financial Viability Standard requires Registered Providers (RPs) to adhere to all relevant law and comply with their governing documents and all regulatory requirements. It also stipulates that the interests of the taxpayer and the reputation of the sector are protected. Additionally, RPs must have effective risk management and internal controls in place. This is also required under the NHF Code of Governance.
- 1.4 In some circumstances offering or accepting a gift or hospitality could constitute an act of bribery. The Bribery Act 2010 makes it an offence for a company or individuals to accept or offer a bribe. This is explained in the Group’s Anti-Fraud, Bribery, Corruption and Money Laundering Policy.
- 1.5 The Group is required to comply with the Economic Crime and Corporate Transparency Act 2023 to ensure controls are in place to prevent any employee or agent of committing fraud intended to benefit the Group.

2.0 Policy Statement

- 2.1 This Policy considers a number of areas including the purpose of corporate hospitality, and the use of a Gifts & Hospitality Register (“the Register”).
- 2.2 The conduct of persons working for, or on behalf of, the Group must always be above any suspicion of impropriety or conflict of interest. As a consequence, they should never receive benefits of any kind from a third party which might reasonably be thought to compromise their personal judgement or integrity. In this field, perception is as important as reality.
- 2.3 Employees, Board and Committee Members must never accept or offer any gifts and/or hospitality which might, or reasonably appear to, compromise their personal judgment or integrity or place them under an improper obligation.
- 2.4 It is not uncommon for gifts or hospitality to be offered, and dealing with this can be a sensitive issue. Individuals should make a reasonable judgement about whether or not to accept gifts and/or hospitality and are responsible for ensuring that any gifts or hospitality accepted can stand up to scrutiny, recorded in accordance with the Gifts and Hospitality Procedure and do not bring the Group into disrepute.

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- 2.5 No gifts and/or hospitality can be accepted if they are likely to affect the Group's impartiality, create a potential conflict of interest or be thought to imply an obligation to the person or organisation offering it.
 - 2.6 Failure to comply with the Policy may expose both individuals and the organisation to the risk of fraud and/or bribery and the appropriate disciplinary/criminal action.

3.0 Policy Scope

- 3.1 This Policy applies to all individuals working at all levels within the Group, including: Board members, Executive and Non-Executive members (including co-opted members), employees (whether permanent, fixed-term, or temporary), trainees, seconded, casual staff and agency staff, interns and students, agents, sponsors, volunteers or any other person associated with the Group wherever located (collectively referred to as "staff" in the policy). As well as contractors, vendors, consultants, agents and other internal and external stakeholders and any other parties who have a business relationship with the Group.

4.0 Definitions

- 4.1 **Gift** - an item or service given, without the expectation of receiving anything in return and is generally made without pre-conditions. This can include items on permanent loans as well as the sale or lease of assets at less than market value.
- 4.2 **Hospitality** - is an offer of generosity from an external organisation, such as free lunches, dinners, holidays and other social events. These events include team building days, invitations to sporting events, upgrade at a sporting event and high value events. This list is not exhaustive.
- 4.3 **Impropriety** – is the failure to observe standards of honesty or proper behaviour. Behaving in a way which is dishonest, socially unacceptable, or unsuitable for a particular situation.

5.0 Roles and Responsibilities

- 5.1 **Group Chief Executive** - has overall accountability and responsibility for the implementation of this policy.
- 5.2 **Directors** - must ensure that Managers within their control are made aware of the provisions set out in this Policy and must ensure that this Policy is implemented within their Directorate.



5.3 **Company Secretary/ Governance Manager** - is responsible for:

- Advising staff on the contents of this policy;
- Reviewing expenditure on conventional hospitality during the year to ensure it is not excessive;
- Maintaining the register; ensuring it is open for inspection and scrutiny;
- Ensuring adequate records are maintained;
- Reporting to the Executive Team;
- Reporting to the Audit & Risk Committee.

5.4 **Audit and Risk Committee** – The Committee and its members are responsible for periodically reviewing the Gifts and Hospitality Register via a quarterly report from the Company Secretary/ Governance Manager.

5.5 **Managers** - All managers are responsible for:

- Ensuring that their staff are aware of and adhere to this Policy
- Reviewing and authorising all gift and hospitality declarations made by their team, prior to these being submitted to the Company Secretary.

5.6 **Employees** – All employees are responsible for:


- Adhering to this Policy
- Declaring any offers of gifts and hospitality
- Ensuring that declarations shall be honestly and accurately made.

5.7 **Providers/Recipients** – Corporate hospitality and/or gifts can be provided and/or received if:

- It is reasonable and proportionate to the needs of the organisation in order to generate and/or maintain good relations with potential stakeholders.
- The general principle is that, if a member of staff or Board Member has any doubt about the propriety of accepting a gift or hospitality, then it should be refused.
- The policy prohibits the offer or receipt of gifts, hospitality, payment or expenses whenever these could affect, or be perceived to affect, or be reasonably considered to have affected, the outcome of business transactions (including those in the future) and are not reasonable and bona fide.

6.0 Provision of Gifts and/or Hospitality

6.1 General Principles: Provision of gifts and/or hospitality should not be regarded as part of the normal conduct of the organisation and should only be a modest expense.



6.2 **Provision of Gifts:** While it is essential to maintain and cultivate contacts with outside groups, members of staff and the Board must bear in mind the principles of propriety and correctness when providing gifts of any value. A notional limit of £25 per recipient should be applied.

6.3 **Provision of Hospitality:** All expenditure on hospitality must be able to withstand both internal and external scrutiny. Such expenditure should be value for money and incurred in accordance with the principles of regularity and propriety. The level of hospitality should not be excessive, and it is a matter of judgement as to what is appropriate and reasonable in each circumstance.

6.4 **Hospitality Expenditure:** The following list provides some examples of what would be deemed as acceptable hospitality expenditure:

- Tea / coffee / refreshments;
- Modest lunches provided at Board and Committee meetings;
- Staff development days (only at an external venue);
- Infrequent working lunches;
- Modest lunches provided at meetings with external stakeholders or events (including corporate events).

6.5 For further guidance, please refer to the Gifts and Hospitality Procedure.

	Policy Control Sheet Declaration of Interest Policy Policy reference number - 2026/005
Policy Author	Angelina Hicklin Governance Manager
Direct Lead	Suzanne Forster Chief Financial Officer and Company Secretary
Version	1.0 – March 2026
Target audience	Employees, Involved Residents, Board and Committee members of the Group entities; Agency staff; Contractors; Consultants; Suppliers; Customers / service users, and Volunteers
Consultation	Executive Management Team
Date of Equality Impact Assessment	No individuals or groups of people are disadvantaged by the adoption of this policy.
Date of Data Privacy Impact Assessment	The information contained in this policy is low risk therefore no DPIA is required
Approving Body	Audit and Risk Committee
Date of final approval	March 2026
Implementation date	April 2026
Monitoring arrangements	Company Secretary/Governance Manager
Reporting	Audit and Risk Committee – Quarterly as part of the Probity report.
Review date	October 2028
Expiry date	April 2029
Review cycle	3-year review cycle
Policy category	Corporate and Governance
Associated policies and procedures	Anti-Fraud, Bribery, Corruption & Money Laundering and Policy Declaration of Interests Policy Standing Orders
Policy location	SharePoint Workvivo Housing Plus Group website

Summary of changes table

Revision history			
Author	Summary of changes	Version	Authorised by & date
Angelina Hicklin Governance Manager – Wrekin	Reviewed in line with review date and to produce a combined Policy for the Group and incorporate suggested amends from the Wrekin RSM Fraud Assessment and The Group Prevention of Fraud Audit.	1.00 – March 2026	Audit & Risk Committee – 18.03.26