



GIFTS AND HOSPITALITY POLICY (Staff and Board)

Status: Approved PCH Board (efficient action Dec 2022)

Date 5 Dec 2022

1 Introduction

- 1.1 This policy provides a framework for gifts and hospitality that may be acceptably received or given. The aim is to ensure staff and Board members are not open to criticism or undue influence.
- 1.2 PCH expects the highest standard of honesty and probity from all staff and Board members in their business dealings and expects that this can be shown to be the case.
- 1.3 Staff and Board members must not:
 - offer, seek or accept bribes or inducements to act improperly or corruptly
 - seek or accept gifts, hospitality or other benefits from individuals or organisations that might reasonably be seen to compromise your judgement or integrity or place you under an obligation to those individuals or organisations (i.e. housing or job candidates, potential or actual suppliers, contractors or consultants)
 - seek or accept preferential treatment in the provision of benefits such as housing accommodation or employment
- 1.4 Staff and Board members must be aware of the offences under the Bribery Act 2010 broadly classified as 'offences relating to being bribed (e.g., requesting, agreeing to receive or accepting a financial or other advantage for improper performance of function) or offering a bribe (refer to our Anti-Fraud and Bribery Policy).
- 1.5 Failure to comply with this policy mean action under the Disciplinary Policy and Procedure (for staff) or Board member conduct procedures (for Board members).
- 1.6 This policy is not intended for gifts given or received by colleagues within PCH, or hospitality provided within PCH. Nor does it cover gifts provided by contractors as part of social value contract arrangements.
- 1.7 This policy applies to PCH and all its subsidiaries, and covers all staff, volunteers and temporary staff, and all Board and Committee members and co-optees.

2 Gifts and Hospitality Offered to PCH

- 2.1 All offers of gifts and hospitality (except for inexpensive gifts) must be included in the Gifts and Hospitality Received Register within 5 working days of the offer using the digital form on the intranet. The gift/hospitality is approved by the appropriate Director or Chair (in the case of Board members) or Chair of ARC (for PCH Board Chair) and

the register is kept by Head of Governance. Where there is no access to the intranet, the Governance Team must be contacted.

Gift/hospitality offered to PCH	Value	Accept or Decline
Inexpensive gift (i.e. mug, pen, calendar, chocolates, biscuits, flowers, etc.)	Less than £10	Accept (no need to add to register) Exception for gifts received from Housing with Support residents (due to their vulnerability): all gifts added to the register and any over £5 shared with colleagues/donated to charity/added to prize draw
Moderate gift (i.e. expensive chocolates, bottle of wine, etc.)	Between £10 and £25	Accept, add to register and share with colleagues/donate to charity/add to prize draw
Larger gift (i.e. case of wine, etc.)	Over £25 (or over £50 if from a group of individuals)	Decline and add to register
Money or vouchers	Any value	Decline and add to register
Prize won as part of a raffle or draw outside of PCH (i.e. at a work related conference or event)	Any value	Accept and add to register
Modest hospitality not in connection with a business meeting or event (i.e. lunch or dinner)	Less than £50	Accept and add to register
Hospitality not in connection with a business meeting or event (i.e. lunch or dinner)	Over £50	Decline and add to register Exception: where the event is an opportunity to network with existing or potential business partners and declining might place PCH at a competitive disadvantage – seek Director approval before acceptance
Holiday or the use of accommodation for private use	Any value	Decline and add to register

Gift/hospitality offered to PCH	Value	Accept or Decline
Personal invitations to an event not related to the staff members duties (i.e. sporting events, theatre, etc)	Any value	Decline and add to register

2.2 Repeated gifts and hospitality (even inexpensive gifts) from the same source must be avoided as they can be seen to compromise judgement or integrity.

2.3 Where the gift or hospitality may be difficult to return or decline, notify the Head of Governance. The gift or hospitality will be added to the register and either donated to charity or used as a prize in a corporate competition or draw for all staff and/or residents. Where appropriate, the donor should be consulted.

2.4 Staff and Board members must notify the Head of Governance if they suspect they have been offered a gift or hospitality with corrupt intent.

2.5 The list of examples is not exhaustive. If there is any doubt regarding the acceptability of gifts or hospitality, ask the Head of Governance for advice before acceptance.

3 Discounts

3.1 Occasionally, organisations may offer discounts to PCH.

3.2 Where the organisation is not connected with PCH, but is simply offering a promotional discount (i.e. reduced price drinks/meals at a local bar/restaurant) PCH will share these offers with staff and Board members to use as they wish.

3.3 However, some of our contractors may offer staff discounts or benefits in connection with the work that they do. The general rule is that the discount should be available to all PCH staff, and that it cannot be seen as an influence or incentive to provide the contractor with more work or a more favourable relationship.

4 Grants and Loans

4.1 Staff and Board members must not under any circumstances accept:

- Any payment, grant or loan from any funds associated with PCH except under the agreed expenses policy and within approved rates
- Any payment, grant or loan from any organisation with which we have a contractual agreement (except for PCC, utility companies and banks as part of their personal life)

4.2 Staff and Board members must not give or receive loans from their personal money to residents or staff or Board members.

5 Gifts and Hospitality Given by PCH

5.1 Gifts or hospitality given to other organisations or individuals by PCH (or its subsidiary companies) will:

- Be reasonable and appropriate to the circumstances
- Support the furtherance of PCH's objectives
- Always take into account that PCH is a charitable social landlord, funded by the rents of tenants and public subsidy
- Be included in the Gifts and Hospitality Given Register held by the Head of Governance

5.2 Reasonable entertainment of customers and contractors, suppliers or consultants may be authorised in advance by the relevant Director. Receipts are required with a note detailing who was entertained, their organisation, type of entertainment and reason for entertainment; this will be recorded in the Gift and Hospitality Given Register held by the Head of Governance.

5.3 A meal attended only by PCH staff and/or Board members must be claimed under subsistence rules, not entertaining.

6 Equality, Diversity and Inclusion

6.1 PCH will not directly or indirectly discriminate against any person or group of people because of their race, religion, gender, marital status, sexual orientation, disability or other grounds set out in our Equality, Diversity and Inclusion Policy.

6.2 When applying this policy PCH will:

- ensure the processes are fair and transparent
- decisions on gifts and hospitality given and received are based on the policy

7 Monitoring

7.1 This policy is the responsibility of the Head of Governance.

7.2 PCH will ensure staff are aware of this policy and the requirements for declaring and accepting/rejecting gifts and hospitality.

7.3 This policy will be reviewed every three years or more frequently if good practice, legislation or regulation changes, or if the Rules are changed.

7.4 This policy must be read alongside the Contract Standing Orders, Staff Code of Conduct, Disciplinary Policy, Board member conduct procedure, Anti-Fraud, Bribery and Corruption Policy and other relevant policies and procedures.

Issue	Description of change	Approval	Date of issue	Next review due
1	Initial issue	x	x	2020
2	Remove reference to PCHMS	Board	15/9/2020	2022

3	Board and staff policies combined. Updates to values and acceptable gifts and hospitality, addition of EDI and Monitoring and Review sections		5 Dec 2022	Dec 2025
---	---	--	------------	----------