



LODDON
HOMES

Gifts and hospitality policy
Offer of and receiving gifts and hospitality

APPROVED

1. Board members and employees of Loddon Homes Limited and Berry Brook Homes Limited, herein referred to as the Local Housing Companies (LHC) must not accept any gift, inducement or reward, including hospitality, for showing favour or disfavour to any person or other organisation. It is the responsibility of the person receiving the favour to prove that it was not received dishonestly. Employees and Board members must ensure:
 - When acting in an official capacity they must not give the impression that their conduct both inside and outside work with any person or organisation is influenced by the receipt of gifts, rewards and hospitality or any other such consideration;
 - They think about the circumstances in which offers are made and are aware that they may be regarded as owing a favour in return;
 - They have permission from their line managers or the Chairman of the Boards of the LHC before accepting such offers and are aware that the offers may have to be returned or refused;
 - That when gifts or hospitality have to be declined those making the offer should be courteously, but firmly informed of the procedures and standards operating within the LHC; and
 - All offers whether or not accepted must be recorded in the Gifts and Hospitality register.

2. How an employee or Board member should react to an offer depends on the type of offer, the relationship between the parties involved and the circumstances in which the gift or hospitality is offered:
 - Employees and Board members must not be seen to be acting in their own personal interests and need to be careful that their behaviour cannot be misinterpreted.
 - When receiving authorised gifts/hospitality, employees and Board members should be particularly sensitive as to its timing in relation to decisions which the LHC may be taking affecting those providing the hospitality.
 - An offer of a bribe or commission made by contractors, their agents or by a member of the public must be reported to the Chairman or Managing Director of the LHC.
 - Employees and Board members must not accept significant personal gifts from the contractors and outside suppliers, although the LHC may wish to allow employees or Board members to keep insignificant items of token value such as pens, diaries, etc not exceeding the value of £30. The most common form of gift is the offer of wine and chocolates etc. In general, these are shared out among colleagues and provided the offers are reasonable, for example a single bottle of wine, they may be accepted. It is important that all offers are recorded in the Gifts and Hospitality Register including those that are offered and not accepted. The Chairman and Managing Director of the LHC will remind staff and Board members periodically of the process to be followed with regards to gifts and hospitality.

3. No one working for, employed by, or providing services on behalf of the LHC is to make, or encourage another to make any personal gain out of its activities in any way. Any person becoming aware of a personal gain being made at the expense of the LHC or Wokingham Borough Council (WBC), contractors or the public, should follow the LHCs Whistleblowing Procedure, which aligns with WBCs procedure.
4. Employees and Board members may only accept offers of hospitality if there is a genuine need to impart information or represent the LHCs within the business environment in which the LHCs operate. Offers to attend purely social or sporting functions may only be accepted when the LHC should be seen to be represented and there is genuine business benefit from attending such an event. All hospitality must be properly authorised and recorded in the Gifts and Hospitality Register.
5. Employees and Board members may accept hospitality when attending relevant conferences and courses where it is clear the hospitality is corporate rather than personal, where consent is given in advance and where it is satisfied that any purchasing decisions are not compromised. Where visits to inspect equipment, etc. are required, employees and Board members must ensure that their service meets the cost of such visits to avoid putting at risk the integrity of subsequent purchasing decisions.
6. The acceptance of gifts and hospitality may be a subject of criticism placing the LHC in a position that it has to defend such action. Consequently, it is essential that all offers and details of gifts and hospitality be recorded in the Gifts and Hospitality Register - see Appendix 1 for the template register. The Managing Director of the LHC is responsible for ensuring a mechanism is in place for the administration of the Register and that an up to date version of the register is permanently available to view and audit by WBC Holding Company Limited.
7. When providing hospitality, staff and Board members should have due regard to the principle of public accountability. All hospitality should be incurred wholly, necessarily and exclusively in the course of performing authorised duties for the LHC: Staff and Board members should ensure that:
 - Providing hospitality to external clients/ bodies must be reasonable and appropriate to the occasion. Claims for providing hospitality must include details of the third parties and the reason(s) for the hospitality being provided.
 - Expenditure on team events which contain a hospitality element should be signed off by the Managing Director of the LHC and will be an exception to the rule.
 - For offsite training/conference events only reasonable hospitality should be incurred e.g. only booking overnight accommodation where the journey is onerous or the

event requires attendance on more than one consecutive day or is held or goes on in to the evening.

8. For clarity, the provision of gifts for colleagues' birthdays, retirement etc should be at the expense of participating members of staff and Board members and not from the LHC budgets.

9. **Equality and Diversity**

The LHC are committed to working within the Equality Act 2010, the Human Rights Act 1998 and always acts within the scope of its own Equality and Diversity Policy to ensure that no stakeholder, job applicant, employee or other person associated with the organisation is treated inequitably or in an unlawful or unjustifiably discriminatory manner.

10. **Review and monitoring**

This policy will be reviewed in line with any regulatory or legislative changes or by the scheduled review date as per the information provided in document control, whichever is sooner.

DOCUMENT CONTROL

Issue date	Approval date	Planned review date	Actual review date
July 2015	July 2015		February 2021
	March 2021	February 2024	

Appendix 1

LODDON HOMES LTD / BERRY BROOK HOMES LTD

REGISTER OF GIFTS AND HOSPITALITY

Name of officer	Details of Hospitality or Gift	Reason	Given by	Approx value	Signed off by	Date received	Date of disclosed	Entered by

APPROVED