

## Code of Conduct

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Corporate Fit	Internal Management Plan	✓
	Risk Register	✓
	Business Plan	✓
	Equalities Strategy	✓
	Legislation	✓

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### Alternative formats available



Happy to translate  
 Możemy przetłumaczyć  
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 अनुवाद करके खुशी हुई  
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 乐意翻译

Our policies provide a framework to underpin our vision and values, to help us achieve our strategic objectives.

## Our Vision

Local people, local control.

By providing quality homes and services, we will create stronger communities and a better quality of life for our customers.

## Our Values

- Focused on the needs of our customers and communities.
- Supportive of our staff and Committee members.
- Responsible, efficient, and innovative.
- Open and accountable.
- Inclusive and respectful.
- Fair and trustworthy.

## Strategic Direction

Consolidation and improvement: Applicable to our core business as a landlord & property manager.

Growth: Through the new build opportunities, we are taking forward.

Partnerships: Where this can help to address shared goals and increase capacity and value.

Resilience: A key priority across all parts of our business.

## Strategic Objectives

Services: Deliver quality, value for money services that meet customers' needs

Homes & neighbourhoods: Provide quality homes and neighbourhoods.

Assets: Manage our assets well, by spending wisely.

Communities: Work with local partners to provide or enable services and activities that benefit local people and our communities as a whole

Our people: Offer a great workplace environment that produces a positive staff culture and highly engaged staff.

Leadership & Financial: Maintain good governance and a strong financial business plan, to ensure we have the capacity to achieve our goals.

## Our Equalities and Human Rights Commitment

We understand that people perform better when they can be themselves and we are committed to making the Association an environment where employees, customers, and stakeholders can be open and supported. We promote equality, diversity, and inclusion in all our policies and procedures to ensure that everyone is treated equally and that they are treated fairly on in relation to the protected characteristics as outlined in the Equality Act 2010.

## Privacy Statement

As data controller we will collect and process personal data relating to you. We will only collect personal information when we need this. The type of information we need from you will vary depending on our relationship with you. When we ask you for information, we will make it clear why we need it. We will also make it clear when you do not have to provide us with information and any consequences of not providing this. We are committed to being transparent about how we collect and use your data, and to meeting our data protection obligations with you. Further information about this commitment can be found within our full Privacy Statements.

## Policy Scope & Review

For the purpose of this policy the term Association will include all members of the Tollcross Housing Association Limited. Therefore, all employees, governing body members, volunteers, customers and other relevant stakeholders will be expected to adhere to this policy and/or procedure. All policies and procedures are reviewed every 3 years in line with best practice and current legislation. The Association reserves the right to make additions or alterations to this policy and procedure from time to time. Any timescales set out in this policy may be extended where required.

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## 1. Introduction

- 1.1. Registered Social Landlords are required to conduct their affairs with honesty and integrity. This Code of Conduct supports this responsibility by ensuring that all employees are aware of, and comply with, the minimum expected standards of conduct required to observe while employed by us.
- 1.2. This Code is based on the Model Code of Conduct (updated in October 2024) produced by the Scottish Federation of Housing Associations and EVH, which has been endorsed by the SHR.
- 1.3. There are references throughout this Code of Conduct (the Code) to 'you' and 'your' which means the employee of Tollcross Housing Association who has signed this Code. References to 'we', 'us' and 'our' mean Tollcross Housing Association. We attach the greatest importance to ensuring that high standards of behaviour are demonstrated by all of our people and in all of our activities.
- 1.4. Employees must make themselves familiar with the terms of this Code and act in accordance with its requirements at all times. It is their responsibility to monitor their own behaviour against the standards set. Should any employee be unclear on how to act on any occasion they should discuss this with their Line Manager. Employees are required to sign the Code (in the 'Statement of the Acceptance') to confirm that they have read and understood the terms of the Code and they have a personal responsibility to uphold the requirements of this Code.
- 1.5. You must also ensure you are familiar with and comply with all of our policies. If there are any aspects of this Code, or of any of the related policies, on which you are unclear, you must seek guidance from your Line Manager.
- 1.6. In addition to our employees, we expect all contractors, agency workers, or any other indirect workers to work in line with this Code. This will be communicated with them at point of engagement.

## 2. Principles and scope

- 2.1. The Code is based on the Nolan Principles on Standards in Public Life which are recognised as defining good conduct for those who work for the public using public money.
- 2.2. We have defined three groups of principles as the basis for the Code:
  - Honesty and Integrity
  - Openness and Accountability
  - Selflessness, Objectivity, Leadership
- 2.3. Honesty and Integrity: You must act at all times with honesty and integrity. You must not use, or seek to use, your position to gain financial or other benefit for yourself, your family or friends.
  - Integrity - you should avoid having any (financial or other) obligations to outside individuals or organisations that might influence you in relation to the Association.
  - Honesty - you must declare any private interest relating to your duties, and take steps to resolve any conflicts arising in a way that is lawful and protects the reputation, vision and values of the Association.

- 2.4. Openness and Accountability: You must declare all relevant personal interests. You must handle information in accordance with our policies and procedures. You must report to the appropriate senior person within the Association any reasonable and honest suspicions you may have about possible wrongdoing.
- Openness - you should be as open as possible about all the decisions and actions that you take. You should give reasons for your decisions and restrict information only when individual or commercial confidentiality clearly so demands.
  - Accountability - you must accept accountability for your decisions and actions and submit yourself to whatever scrutiny is appropriate internally and/or by external bodies and stakeholders.
- 2.5. Selflessness, Objectivity and Leadership: You must act in the best interests of the Association at all times within the framework set by the organisation, working to promote our aims and objectives, upholding our values and setting a good example by your own conduct.
- Selflessness - you should take decisions solely on the basis of the values and objectives of the Association. You should not do so in order to gain financial or other material benefit for yourself, your family or friends.
  - Objectivity - you should ensure that in the delivery of services, the selection of staff and awarding of contracts, you maintain impartiality and base decisions on merit alone.
  - Leadership - you must support and promote these principles and lead by example.
- 2.6. The Code is not exhaustive and it should be remembered that all employees are responsible for ensuring that their conduct at all times meets the high standards that the RSL sector is recognised for upholding. As well as observing the detail of the Code, you should apply its intention and spirit to all situations in employment.

### **3. Gifts and hospitality**

- 3.1. You must never place yourself under any obligation to third parties, which might influence, or be perceived to influence, the carrying out of your duties. All offers of gifts or hospitality received by employees should be treated with caution. All significant offers of gifts and hospitality must be refused. Appendix 2 provides more information about the gifts and hospitality process.
- 3.2. Employee must act, and be seen to act, wholly in the interests of our organisation, our residents in our communities and other service users. Employees must ensure that they do not benefit improperly from their position.
- 3.3. Employees must not accept any offers of gifts or hospitality from individuals or organisations which might reasonably create – or be capable of creating – an impression of impropriety, influence or place them under an obligation to these individuals or organisations. They must comply with Tollcross Housing Association's Entitlements, Payments and Benefits Policy.

### **4. Financial conduct**

- 4.1. Employees must ensure that they:
- Use funds and resources for the purpose intended, and in a responsible and lawful manner, and safeguard them from abuse, theft or waste.
  - Strive for value for money
  - Apply and observe Association's financial regulations and internal controls
  - Comply with our antibribery and corruption policies.

- 4.2. Theft / fraud - We strive to meet the highest ethical standards. We recognise that, like any other business, there are risks of financial and organisational loss due to fraud. This may damage the service we provide and our reputation with customers, public and the regulators. The Association has a responsibility to protect its assets, reputation and the public funds it receives. The Association is fully committed to the prevention, detection and reporting of fraud, theft and corruption; and the recovery of assets. Employees are obliged to report any instances of suspected theft or fraud. For more details see the Whistleblowing Policy.
- 4.3. Bribery - We forbid all forms of bribery - meaning a financial or other advantage or inducement intended to persuade someone to perform improperly any function or activity. Employees will not offer, seek or accept bribes or other inducements from any individual or organisation and will comply fully with our policy Anti-bribery Policy and legislation. Employees must be aware that offering, seeking or accepting bribes or other inducements will result in disciplinary action (up to and including dismissal) and may also result in criminal prosecution.
- 4.4. Tendering and Purchasing – All orders and contracts must be awarded on merit and by fair competition. You must not disclose confidential information on the tender process and employees must adhere to the Association's Procurement Policy. No employee will have any involvement in a tendering or purchasing process, in which they (or a close relative) are directly connected to an organisation with which they may enter into a business relationship with the Association.

## 5. Conflicts of interest

- 5.1. It is expected that employees treat each other with mutual respect. Close personal familiarity could be prejudicial to the good running of the Association and should be avoided. Employees should not use informal channels to influence the business of the Association. Employees must not use, or seek to use, their position to promote their personal interests or those of any person with whom they are closely connected or the interests of any business or other organisation with which they have a connection.
- 5.2. Employees, or someone closely connected to them, cannot as a result of their role with us receive preferential treatment relating to any services provided by the organisation or its contractors/suppliers, and they should be able to demonstrate this.
- 5.3. Employees who find that their friendship or close relationship may cast doubt on the objectivity of their decision-making should advise their line manager. This is to prevent them leaving themselves open to allegations of bias or favouritism. Further information about relationships at work can be found in Appendix 3
- 5.4. Declaring interests
- 5.4.1. Employees must recognise that the Association if required to ensure that no conflict arises, or could reasonably be perceived to arise, between my duties and my personal interests, financial or otherwise. Employees must declare, and manage openly and appropriately, any actual or potential interests or conflicts.
- 5.4.2. Where an employee has a personal, business or financial interest in any matter that is relevant to the Association's activities or is being considered (or is likely to be considered), or they know that someone to whom they are closely connected has such an interest, the must declare it promptly and record it in our Register of Interests, and they must keep their entry in the Register of Interests complete, accurate and up to date.



## **6. Property, resources, facilities and premises**

- 6.1. All property belonging to the Association can only be used for business purposes unless explicit consent is given. This includes physical property, the business premises and intellectual property. You must not undertake work for another organisation - or for any personal business - on the Association's premises nor use our resources or facilities for such a purpose, unless you have specific permission from your line manager
- 6.2. Employee must only use our property, resources, facilities and premises for the purposes intended and in a responsible and lawful manner. This includes, but not limited to, office premises, telephone, computer and other IT facilities, equipment, stationery, transport and staff.
- 6.3. All property of the Association that you use or are responsible for must be used carefully and must be protected and stored in a safe place when not in use. It must also be only used for the Association's benefit and in the way that it is intended. It should not be used for the benefit of individual employees unless explicit consent has been sought and given by the appropriate manager.
- 6.4. Employees are provided with access to and the use of the Associations ICT services. Employees must use these services in line with the relevant ICT and data protection policies and procedures.

## **7. Handling information**

- 7.1. As a publicly funded body, we are required to be open and transparent and should only withhold information when there are justifiable reasons for doing so, for example matters that are personally or commercially sensitive. This means that general documentation such as minutes, Association policies and approved annual accounts should be made available to the general public upon request.
- 7.2. When handling information, there should be a balance between openness and confidentiality. It is a requirement that certain information is available to members, auditors, the Regulator(s), etc. Employees should be aware of these requirements and act accordingly. Employees must respond to requests for information positively and must not prevent people or bodies from being provided with information that they are entitled to receive.
- 7.3. Employees need to be equally aware of the types of information that must be kept confidential. Personal information about our tenants, applicants for housing, colleagues or any other individuals must be regarded as strictly confidential. Information about such individuals must only be released outside the organisation with the prior written consent of the individual concerned and then only by appropriate staff members.
- 7.4. All data records, both paper and computer, relating to individuals will be kept confidential to appropriate employees. Such details must not be divulged to employees who do not require to know it in the course of their employment.
- 7.5. It is important that you ensure that confidential information acquired through your role as an employee, is not disclosed to anyone other than those having a right to the information. It is equally important to ensure that confidential information acquired through your role is not used for personal advantage, or any other purpose for which it is not intended.

7.6. Employees must observe and uphold the legal requirements and our policies in respect of the storage and handling of information, including personal and financial information. Our Data Protection Policy and Retention Policy and Schedule gives further guidance.

7.7. Respecting confidentiality

7.7.1. Employees must respect confidentiality and ensure that they do not disclose information to anyone who is not entitled to receive it, both whilst I am a member of staff and after I have left employment at Tollcross Housing Association.

7.7.2. Unless specifically authorised to do so, employees must not make comments or statements in public or to the media or on social media sites, or pass any documents or other information to the press or media about us or our activities. Employees will pass any such enquiries to the Chief Executive.

7.7.3. Employees must not publish any material or deliver any lecture or address any issues relating specifically to the Association or our activities without prior approval. This includes invitations to speak at conferences or external events.

7.7.4. Employees must not disclose any private or confidential information relating to the Association, our customers, partners, suppliers, governing body members, or employees on any social networking sites, bulletin boards, blogs or similar.. This applies whether I am posting under my own name or a pseudonym.

**8. Working with tenants and other service users**

8.1. The Association works with and supports a range of tenants and service users, who may be vulnerable. Employees must maintain high standards of professionalism, fairness and courtesy in all dealings with tenants and other service users.

8.2. Employee must not allow any personal relationship with a tenant or other service user to conflict with the conduct of their role and responsibilities.

8.3. Employees must use the appropriate channels for handling tenancy and service provision issues, and will not act outside our established procedures in any matter concerning any tenant or other service user.

8.4. As a general rule, in relation to tenants and service users employees must not:

- Give or loan them money
- Receive a gift or loan of money from them
- Invite or influence them to make a will or trust under which you are named as executor, trustee or beneficiary.

8.5. In circumstances where an employee has declared a family connection to a tenant/service user, a common sense approach will be applied and the Association would not seek to impose restrictions on the private exchange of money between you and that individual.

**9. Upholding our reputation**

9.1. Employees must not act in a way that could reasonably be regarded as bringing or risks bringing the Association into disrepute. This would include publicly making any derogatory comments about the Association, its employees, governing body members, service users, partners and anyone that we are doing business with. Employees must discuss any



grievance or concern that they have about an employee, Management Committee members, or any other wrongdoing with my Line Manager or with the Corporate Services Director.

- 9.2. Employee must always be a positive ambassador for the Association and our work, especially when attending events as a member of our staff or in dealing with outside bodies.

## **10. General matters of conduct and responsibilities**

10.1. High standards of personal conduct are expected of employees. Employees must

- treat others with courtesy and respect and consider and respect the views of others.
- show courtesy, efficiency, reliability, sobriety and punctuality, and must treat others with respect at all times. This includes considering the views of others and being tolerant of differences.
- conduct themselves in a courteous and professional manner, ensuring that their actions or behaviours do not cause distress, alarm or offence.
- not harass, bully or attempt to intimidate any person.
- avoid any situation that could give rise to suspicion or suggest improper conduct.
- ensure when presenting information, that all reasonable steps are taken to ensure that the facts and relevant issues are set out truthfully.
- inform their Line Manager, or another member of the Leadership Team if they are notified of any action by a professional body that is relevant to their role and/or which could impact the Association's reputation..
- take care when displaying materials in the office, and ensure that these would not reasonably cause offence to your colleagues.
- must not seek to use informal channels to influence the governing body regarding decisions to be made about the conduct of our business.
- adhere to both the letter and the spirit of our equality and human rights policy.
- When attending meetings, I will be courteous to all attendees and respect the position of the meeting chair or convenor.

10.2. In fulfilling their role, employees must:

- comply with the terms of my appointment and our policies and procedures relating to their role.
- fulfil their duties responsibly, exercising reasonable skill and care and acting at all times in the Association's best interests and that of our tenants and other service users. Employees must always aim to put the needs of the Association's tenants and service users first in their day-to-day work within the framework of our policies and procedures.
- uphold and promote the Association's values, aims and objectives and in accordance with the relevant legal and regulatory requirements (including those, as applicable, of the Scottish Housing Regulator, the Office of the Scottish Charity Regulator, and the Financial Conduct Authority).
- take direction from their Line Manager, other members of the Leadership Team and the governing body, and exercise responsibly any authority that comes with my role as an employee.
- participate in any necessary training, and play an active part in their performance appraisal process, and contribute to the identification of any personal training needs they may have in order to keep their professional skills and knowledge up to date.

- 10.3. Equality & Inclusion: Employees should always be courteous and helpful. They should deal fairly, equitably and consistently with each member of the public / staff / stakeholders and must follow our equalities commitments. They must not act in a way that unjustifiably favours or discriminates against particular individuals, groups or interests. This also applies when you are representing the organisation out-with the Association's premises. Employees must be aware of and adhere to the Equality Act 2010 (including awareness of the 9 protected characteristics).
- 10.4. Recruitment: Employees involved in making appointments should ensure that these are based on merit alone. Personal preferences should not influence judgments to be made. Further information can be found in the Association's recruitment and selection policy. No employee will participate in a selection process where the candidate is a relative or close personal friend. Employment law and the Association's current recruitment and selection procedures must be thoroughly observed and be impartial. All recruitment and selection procedures and decisions must also comply with the Association's equalities commitments.
- 10.5. Misuse of drugs, alcohol & psychoactive substances: It is gross misconduct offence to be on the Association's premises and/or carrying out your duties when under the influence of alcoholic drink or non-medically prescribed drugs. See the Alcohol, Drug and Psychoactive Substance Misuse Policy for more information.
- 10.6. Gambling: Gambling activities should not be conducted on the Association's premises. However, discretion may be used in relation to raffles, national lottery syndicates, occasional sweepstakes etc. where the amount gambled is relatively low.
- 10.7. Political, campaigning and public activities: It is crucial that employees carry out their work without any bias towards any political or other group. Employees must follow the expressed policies and procedures of the Association as their employers, and must not allow their own personal or political opinions to intervene with their work or impartiality. None of the above impinges on an employee's rights to be an active citizen or, for example, an active trade unionist or acting in such capacity.

## **11. Conduct / activities outside work**

- 11.1. The Association does not seek to dictate how employees conduct themselves in their personal lives. However, unlawful or other conduct by employees which may jeopardise the Association's reputation or position will be dealt with under the Association's disciplinary policy and procedure.
- 11.2. There are occasions where an employee's outside activities can affect their work, or other interests of the Association. However, in all circumstances, no paid or outside work should be undertaken at your place of work or require the use of office facilities. This applies to any voluntary or unpaid work. Employees should inform their line manager of any possible conflict and seek necessary written permission to continue with the activity. If the outside activities will overlap with your work with the Association, do not commence until written permission has been granted.
- 11.3. Employees may not accept a post or undertake any occupation or activity which would require their attendance at any time during office hours and/or prejudice the proper performance of their duties for the Association., Permission may be granted by the employee's line manager for such activities. This permission should therefore be sought in advance. Where the employee is in doubt as to whether this condition would apply, they should err on the side of caution and speak with their line manager.

- 11.4. Social Networking – information posted on such sites is classed as public not private information. You are therefore not allowed to disclosure confidential information relating to the Association and the work that we do. It is also prohibited to post any comments that may potentially bring the Association into disrepute. Any such actions could result in disciplinary action as per the Association’s disciplinary policy and procedure.

## **12. Reporting concerns**

- 12.1. The Association recognises that employees will very often be the first to see or suspect misconduct or wrongdoing. We wish to encourage all our employees to keep their eyes open and to raise concerns in an appropriate manner to demonstrate and ensure good practice in all our activities. To that end, we have a Whistleblowing Policy that details how concerns can be raised.
- 12.2. Employees must report any concerns if they become aware of any actual or potential fraud, corruption or wrongdoing, or breaches of this Code. They must report this to my Manager or Director within the Leadership Team, and must be aware that they may do so on a confidential basis.
- 12.3. Employees must not victimise any person who has used - or intends to use/is suspected of having used - our confidential reporting or whistleblowing procedures to report any actual or alleged fraud, corruption or wrongdoing by others.

## **13. Breach of the Code**

- 13.1. As an employee you have a responsibility to promote and uphold the requirements of this Code and any other Code that your membership of a relevant professional body imposes. If you consider that you may have breached the Code, or have witnessed or become aware of a potential breach by another employee, you should immediately bring the matter to the attention of your Manager or the Corporate Services Director.
- 13.2. Any material breach of the Code will be considered under our disciplinary procedures and may result in a disciplinary action being taken, which may include dismissal. Employees have a duty to co-operate with and contribute to any investigation relating to a potential breach of the Code or an associated matter

## Appendix 1 – Equality & Human Rights Impact Assessment

Policy	Code of Conduct		
EIA Completed by	Corporate Manager	EIA Date	May 2025

- 1. Aims, objectives, and purpose of the policy / proposal**  
To provide a framework of expected conduct and behaviours expected of our employees.
- 2. Who is intended to benefit from the policy / proposal?**  
Employees and managers – they will have clarity over what should be expected from all employees.
- 3. What outcomes are wanted from this policy / proposal?**  
Employees to understand the expected conduct and behaviours, and role model these.
- 4. Which protected characteristics could be affected by proposal?**

<input type="checkbox"/> Age	<input type="checkbox"/> Gender reassignment	<input type="checkbox"/> Religion or belief
<input type="checkbox"/> Disability	<input type="checkbox"/> Marriage & civil partnership	<input type="checkbox"/> Sex
<input type="checkbox"/> Race	<input type="checkbox"/> Pregnancy and maternity	<input type="checkbox"/> Sexual orientation
- 5. If the policy / proposal is not relevant to any of the protected characteristics listed in part 4, state why and end the process here.**  
The policy has no positive or negative impact on the protected characteristics detailed in the Equality Act.
- 6. Describe the likely impact(s) the policy / proposal could have on the groups identified in part 4**
- 7. What actions are required to address the impacts arising from this assessment? (This might include; collecting data, putting monitoring in place, specific actions to mitigate negative impacts).**
- 8. Consider the impact and actions to be considered for the following Human Right articles:**

<b>Article 6: Right to a fair trial</b> Everyone should be given the opportunity to participate effectively in any hearing of their case and present their side.	
Impact: n/a (any breach of policy would be dealt with inline with the Disciplinary Policy).	Actions:
<b>Article 8: Right to respect for private life, family life &amp; the home</b> Everyone has the right to access and live in their home without intrusion or interference.	
Impact: n/a	Actions:
<b>Article 14: Prohibition of discrimination</b> Everyone has equal access to the other rights contained in the Human Rights Act.	
Impact: n/a	Actions:

## Appendix 2 – Gifts & Hospitality Guidelines

### Received from tenants and external sources

Employees must not accept any offers of gifts or hospitality from individuals or organisations which might reasonably create – or be capable of creating – an impression of impropriety, influence or place you under an obligation to these individuals or organisations.

Employees must never place themselves under any obligation to third parties, which might influence, or be perceived to influence, the carrying out of their duties. All offers of gifts or hospitality received by employees should be treated with caution. All significant offers of gifts and hospitality must be refused.

For guidance, significant gifts and hospitality include, but are not restricted to the following:

- Money,
- Free goods
- Free services
- Provision of a holiday or weekend away
- Free accommodation and travel
- Free meals (not relating to specific work related events)
- Any form of hospitality which could reasonably be perceived as lavish or excessive
- Any offer of hospitality made by a party with whom the Association is in dispute, even if in normal circumstances the offer might be considered not to be significant

Notwithstanding the above, gifts or hospitality of a minor value are classed as non-significant and may be accepted. Examples of non-significant gifts and hospitality would include, but are not restricted to the following:

- Small gifts of a promotional or advertising character, which are often given to a wide range of people, e.g. calendars, diaries, pens, charts and other similar articles.
- Small gifts made to a number of people on the same occasion or as part of a normally accepted practice, e.g. small gifts given by another Housing Association to celebrate their anniversary.
- Small gifts offered on an unsolicited basis by a contractor, customer or other party, e.g. a box of chocolates, etc.
- Attendance in an official capacity to functions to which invitations have also been sent to representatives of other organisations.

Non-significant gifts and hospitality can be accepted if:

- the cumulative value of gifts received from the same source in a 12 month period does not exceed £60
- you do not receive more than two such gifts from the same source in a 12 month period
- you record receipt of the gift(s) in the register

Gifts should not be accepted on a regular basis from an individual customer. You may accept a one-off gift. However, where there appears to be a pattern of gifts being offered you must decline the request and highlight the pattern to your line manager. Consideration needs to be taken in relation to vulnerable customers in how this matter is dealt with (further advice should be sought from your line manager).

It would normally be expected that the value of non-significant gifts / hospitality would not exceed £60. Money is never acceptable. Non-significant perishable gifts (i.e. chocolates / biscuits) should be opened and shared amongst the staff within a department / work location.

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 advise the donor that the gift will be donated to charity or will form part of our annual charity fund raising activities and record the gift and the action taken in the register within five days.

### **Association giving**

Gifts from the organisation to our people can be permitted in cases where it is to mark a special occasion or significant events including, Family events (e.g. marriage, milestone birthday, birth of a child), retirement and leaving the organisation. These must be recorded in the relevant register and the value of such gifts will not normally exceed £100.

### **Hospitality associated with our business and that of its partners**

Modest hospitality, such as a sandwich lunch or networking event, is permitted and does not need to be recorded. 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.

You should not accept invitations with a value that is greater than £60, unless you have prior approval from the Committee. 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. In this case, the reason for acceptance must also be included in the register and countersigned by the CEO / Chairperson as appropriate.

### **Our people seeking donations from our contractors/suppliers when fundraising for charity**

This is permitted provided, approval is gained from the CEO prior to making any approach and any donations received are recorded in the register. 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.