Gifts and Hospitality

Version 2

Category: Corporate

Latest Review Date: April 2016

Review Frequency: 3 years

Owner: Company Secretary

Contributors: Development & Sales Director, Head of Finance, Head of HR, Housing Services Manager, Organisation & Management Development Manager

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POLICY

1. Policy Goal

To ensure that the ExtraCare Charitable Trust (ECCT) does not unduly influence or is not perceived to unduly influence third parties by the offer of gifts or hospitality, and is not unduly influenced, nor perceived to be unduly influenced, by third parties by the receipt or acceptance of gifts or hospitality.

2. Business Objectives

To uphold the reputation of ECCT and maintain public confidence in its integrity. To meet the requirements of anti-bribery legislation and regulatory guidelines in order to minimise the risk of criminal prosecution; enforcement action by regulatory bodies; and diminution of reputation.

3. Organisational Statement

As a responsible provider of housing, care, housing related support and associated services for people over 55 and as a responsible employer ECCT is committed to ensuring that it, and those who represent it, meet the highest standards of probity and conduct and that decisions and actions are properly taken in the best interests of the ECCT as a whole.

4. Outcomes

All ECCT trustees, subsidiary board members, staff, volunteers, residents, other service users and contractors are aware of this policy

Trustees, subsidiary board directors, staff and volunteers understand and comply with this policy.

Registers of Gifts & Hospitality are complete, accurate and up to date at all locations.

There are no criminal prosecutions, no enforcement actions by regulators and no significant adverse media coverage.

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5. **Application**

This policy applies to every Trustee, subsidiary board director, employee and volunteer of ECCT.

The Board of Trustees is responsible for ensuring compliance with this policy in respect of Trustees, subsidiary board directors and the Executive Directors.

The Executive Directors and all managers are responsible for ensuring compliance in their respective areas of responsibility by all members of staff, who are bound by their contracts of employment.

All ECCT employees are required to act in line with this policy and any breach of this policy is misconduct which could result in action being taken in line with the Disciplinary Policy.

Volunteers understand that the policy applies to them and that they are required to adhere to the policy when acting in their agreed capacity as a volunteer representing ECCT. This policy is designed to work in conjunction with the Volunteering Strategy and Policy.

Residents, Friends, individual donors and third party suppliers and contractors have an understanding of the policy and how it applies to them.

Other agencies, regulators and partners are aware of the policy and acknowledge their role in implementing it.

6. **Reason for the Policy**

To ensure that those who represent and act on behalf of ECCT act, and are seen to act, only in the best interests of ECCT and avoid any appearance of impropriety.

To minimise the risks to the business from reputational damage and to meet meet the requirements of relevant legislation and regulatory guidelines

7. **What is new / What is different**

This is a revision of the policy last approved by the Board in December 2012. The policy has been updated to reflect organisational and policy changes

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since it was first issued and to clarify how the policy applies to volunteers but there are no substantive amendments.

8. **How to measure success**

An up to date and accurate Gifts and Hospitality Register is maintained in every ECCT location and at Head Office.

No complaints are made relating to inappropriate offering or receipt of gifts of hospitality, no regulatory investigations and no significant adverse media coverage.

9. **Reference to relevant documents**

Regulation / Guidance	In House Documents
The Bribery Act 2010	Code of Governance
Ministry of Justice guidance - Bribery Act	Code of Conduct
Anti-Bribery Principles for Not for profit Organisations – Transparency International UK	ExtraSpecial Conduct
CQC Regulatory Guidance	Staff Handbook
	Volunteering Strategy & Policy
	Financial Regulations
	Conflicts of Interest Policy
	Anti-Bribery Policy
	Procurement Policy
	Anti-Fraud, Theft & Financial Irregularity Policy
	Mental Capacity Policy
	Management of Residents Money and Valuables Policy
	Safeguarding Vulnerable Adults and Children Policy
	Professional Boundaries Code of

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Conduct Policy

10. **Approval date** – September 2016

11. **Next review date** – September 2019

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