

	Probity & Integrity Policy
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1	Conflicts of Interests Policy	M Warner	Aug 22	Board	Aug 22	Aug 22	Aug 25
1	Whistleblowing Policy	M Warner	Aug 22	Board	Aug 22	Aug 22	Aug 25
1	Anti Fraud, Bribery & Corruption Policy	S Davies	Jul 23	Board	Jul 23	Jul 23	Jun 26
1	Receipt of Gifts Policy	A Malik	Jun 22	Board	Jun 22	Jun 22	Jun 25
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1. Introduction

This policy seeks to set out Eldonian Community Based Housing Association's (ECBHA's) policy positions regarding ensuring probity and integrity of the association.

This policy has brought together a number of separate policies into one document. Those previous documents and applicable content are superseded by this document.

This policy sets out how ECBHA intends to comply with the relevant legislation and regulatory requirements and guidance.

ECBHA seeks to be transparent with all stakeholders regarding its performance, compliance and assurance with this policy.

The policy is relevant to all ECBHA employees, residents, contractors and other person's or other stakeholders delivering or affected by activities and ECBHA homes and services.

A - Conflict of Interest

1. Introduction

ECBHA is committed to ensuring high standards of conduct in all that we do. It is essential that any potential or actual conflicts which Board members and staff members have are appropriately identified, declared and managed, to avoid the perception that ECBHA's work has been improperly influenced by Board member or staff member conflicts.

2. Scope

This policy applies to Board members and all members of staff of ECBHA.

3. Policy objectives

The objectives of this policy are to ensure that:

- ECBHA's work is carried out in an environment free from the suggestion of improper influence
- ECBHA complies with the National Housing Federation's Code of Governance 2020
- Board members and staff members of ECBHA are aware of the organisation's policy on conflicts of interest
- Board members and staff members of ECBHA are provided with guidance to enable them to identify, declare and manage conflicts and
- All possible conflicts are identified, declared and managed appropriately.

4. Definition

Conflict of interest

A set of circumstances that creates a risk that an individual's ability to apply judgement or act in one role is, or could be, impaired or influenced by a secondary interest. It can occur in any situation where an individual or organisation can exploit a professional or official role for personal or other benefit. This definition is based on generally accepted standards.

Conflicts can exist if the circumstances create a risk that decisions may be influenced, regardless of whether the individual actually benefits. The perception of competing interests, impaired judgement or undue influence can also be a conflict of interest. Conflicts might occur if individuals have, for example:

- a direct or indirect financial interest
- non-financial or personal interests or
- conflicts of loyalty where decision-makers have competing loyalties between an organisation they owe a primary duty to and some other person or entity.

5. Declaring interests

Board members and staff members shall complete and provide to the Company Secretary:

- a declaration of interests form on appointment to their role as Board member or staff member
- an updated declaration of interests form in the event that it is necessary to declare a new interest or to delete a previous interest and
- a revised declaration of interests form on an annual basis when requested to do so by the Company Secretary.

In accordance with Paragraph 20 of the organisation's Rules, every Board member shall ensure that the Company Secretary at all times has a list of:

- all other bodies in which they have an interest as:
 - a director or Officer
 - a member of a firm
 - an official or elected member of any statutory body
 - the owner or controller of more than two per cent of a company the shares in which are publicly quoted or more than ten per cent of any other company.
- any property owned or managed by ECBHA which they occupy or
- any other significant or material interest.

In accordance with Paragraph D15 of the organisation's Rules, no Board member shall have any financial interest in any contract or other transaction with ECBHA except in specific permitted circumstances.

Board members and senior staff members should not, in a personal capacity, contract for the supply of goods or services with organisations with which ECBHA has a commercial relationship.

At the commencement of each Board meeting, the Chair shall enquire whether there are any items on the meeting agenda in respect of which any Board member needs to declare an interest. Any declarations of interests made will be recorded in the minutes of the meeting. General declarations should not be regarded as a substitute for making specific disclosures where appropriate at particular Board meetings.

Unless it is expressly permitted by the organisation's Rules, any Board member declaring an interest in respect of an agenda item shall not remain present (unless requested to do so by the Board) and shall not have any vote on the matter in question. If there is any question as to the right of a Board member to participate in a Board meeting, a decision will be made in accordance with Paragraphs D17 and D18 of the organisation's rules.

In accordance with Paragraph D23 of the organisation's Rules, Board members who are residents shall be deemed not to have an interest in any decision affecting all or a substantial group of residents.

In the case of a fundamental or ongoing material conflict, the Board will determine whether the individual concerned should cease to be a Board member.

6. Consequences of not declaring an interest

If requested by a majority of the Board members at a meeting convened specially for the purpose, a Board member failing to disclose an interest shall vacate their office either permanently or for a period of time as the Board directs.

7. Recording and reporting

All declarations of interest made by Board members and staff members will be recorded in a register of interests which will be maintained by the Company Secretary.

The register of Board members' declarations of interest will be published on the organisation's website and will be reported on annually to the Board.

8. Staff and Board member training

All new staff and Board members will receive initial training on this policy and will receive annual reminders of the policy.

B - Whistleblowing

1. Introduction

ECBHA is committed to ensuring high standards of conduct in all that we do. It is important that individuals know what to do if they come across something that they think is fundamentally wrong, illegal or endangers others.

The reporting of wrongdoing by staff members may be covered by the law concerning protected disclosure of information. Whistleblowing law is located in the Employment Rights Act 1996 (as amended by the Public Interest Disclosure Act 1998). It provides the right for a worker to take a case to an employment tribunal if they have been victimised at work or they have lost their job because they have 'blown the whistle'.

It is important that this whistleblowing policy is followed when raising any concerns, to ensure that the matter is dealt with correctly. Where a concern is properly raised under this procedure, the individual raising the concern will be protected from any unfair or negative treatment.

2. Policy objectives

The objectives of this policy are to:

- encourage employees, Board members, customers and other stakeholders who have serious concerns about any aspect of our work to come forward and express those concerns
- ensure that concerns about wrongdoing are raised and dealt with at an early stage and in an appropriate manner
- provide a mechanism and guidance on how to raise those concerns and
- reassure individuals that they may raise genuine concerns without fear of reprisals, even if they turn out to be mistaken, and that disclosures will be dealt with appropriately, consistently, fairly and professionally.

3. Definition of whistleblowing

Whistleblowing is the reporting of wrongdoing within an organisation.

A whistleblower is someone who reports such wrongdoing. A whistleblower may be an employee, a Board member, a customer or another stakeholder such as a contractor or a consultant.

4. Legal protection

To be covered by whistleblowing law, a worker who makes a disclosure must reasonably believe two things. The first is that they are acting in the public interest. As a result personal grievances, for example bullying, harassment or discrimination, are not usually covered by whistleblowing law and are not within the scope of this policy. Instead they should be reported in line with the organisation's Grievance Policy.

The second thing that a worker must reasonably believe is that the disclosure tends to show past, present or likely future wrongdoing falling into one or more of the following categories:

- criminal offences (this may include, for example, types of financial impropriety such as fraud)
- failure to comply with an obligation set out in law
- miscarriages of justice
- endangering of someone's health and safety
- damage to the environment or
- covering up wrongdoing in the above categories.

5. Raising a concern

You may raise a concern in writing, by email, by telephone or face to face.

Whilst a whistleblower is under no compulsion to provide evidence, when raising a concern you should try to provide information which demonstrates that there are reasonable grounds for the concern to be acted upon such as:

- the background and reason behind the concern
- whether you have already raised the concern with anyone and the response and
- any relevant events giving dates, names and places where known.

If you are an employee you should, in the first instance, raise the matter with your line manager. If you do not feel comfortable raising the matter with your line manager, you should raise it with a member of the Executive Management Team or the Company Secretary. If you do not feel comfortable raising the matter with any member of staff, you should raise it with the Chair or Vice-Chair of the Board. You may come forward with the support of a colleague or trade union representative if you wish to do so. At any point you may contact Protect, a whistleblowing charity which aims to stop harm by encouraging safe whistleblowing, for advice.

We realise that 'blowing the whistle' can be difficult and cause anxiety for the whistleblower. We will support the individual during and after the investigation of the concerns raised. Support may consist of mentoring, advice, counselling, mediation or dispute resolution.

If you are a Board member you should raise the matter with the Chair or Vice-Chair of the Board or with the Company Secretary.

If you are a customer or other stakeholder you should raise the matter with the Chief Executive or the Company Secretary.

We hope that this policy gives potential whistleblowers the reassurance they need to report concerns internally. However we recognise that there may be circumstances where you wish to

report your concerns to an outside individual or body. You can do that by reporting your concerns to:

- The Regulator of Social Housing
- The organisation's internal auditor
- The organisation's external auditor
- The organisation's legal advisors or
- Your MP.

Before making the decision to share information with an outside individual or body, we recommend that you obtain advice from your legal adviser, your trade union or Protect.

Contact details for organisations which you may wish to contact can be found in Appendix 1.

6. Anonymous complaints

Anonymous complaints will be investigated, however ECBHA encourages individuals to disclose their identity when expressing their concerns, as an anonymous complaint is more difficult to investigate. In addition, anonymous whistleblowers will not ordinarily be able to receive feedback.

7. Confidentiality

ECBHA will endeavour to protect the confidentiality of whistleblowers, but we might not be able to protect the confidentiality of the whistleblower in all cases.

8. Investigating your concerns

Once a concern has been raised it will be recorded in the whistleblowing register and a lead responsible officer will be assigned to the case. The lead responsible officer will determine the investigative approach to be taken, taking into account of factors including:

- The seriousness of the allegations made
- The credibility of the concerns and
- The likelihood of confirming the allegations from attributable sources.

The lead responsible officer will oversee the conduct of any investigation. The investigation may be conducted by members of staff or by an independent third party such as the organisation's internal auditor. In some circumstances the lead responsible officer may decide that there would be no value in conducting an investigation, e.g. if the concerns fall outside the scope of this policy (in which case the individual expressing concern may be directed to an alternative policy e.g. the Grievance Policy), clearly lack credibility or do not represent a sufficient level of seriousness.

It is likely that you will be interviewed or asked further questions as part of the investigation. You may be accompanied in any meetings by a colleague or trade union representative. You may be requested to sign a written statement confirming the details of the disclosures you have made.

The contact from the whistleblower will be acknowledged within two working days. We aim to respond in full to concerns raised within a further 15 working days but this may not be possible in the context of the nature, scale and complexity of the allegations.

We will feed back the outcome of the investigation to the whistleblower, subject to protecting the confidentiality of other individuals.

If you are not satisfied that your concerns have been dealt with appropriately by ECBHA you may contact:

- The Regulator of Social Housing
- The organisation's internal auditor
- The organisation's external auditor
- The organisation's legal advisers
- Your MP.

Again, before contacting an outside individual or body, we recommend that you obtain advice from your legal adviser, your trade union or Protect.

You may also raise the matter under ECBHA's Grievance Policy if you are dissatisfied with the way in which your concerns have been addressed or handled.

9. Action following investigation

Following the completion of an investigation into a whistleblowing allegation, a written report will be submitted to the lead responsible officer for the case who will determine what action is to be taken, taking account of other ECBHA policies as appropriate. Action to be taken may include reporting to external organisations including but not limited to:

- The Regulator of Social Housing
- The Health and Safety Executive
- The Environment Agency
- HM Revenue & Customs or
- The police.

10. Untrue and malicious allegations

No action will be taken against an individual who makes an allegation in good faith, which is not confirmed by the subsequent investigation.

Employees or Board members who make malicious allegations will be subject to disciplinary action in line with the organisation's policies and procedures.

11. Recording

Each whistleblowing allegation will be recorded in the whistleblowing register which will be maintained by the Company Secretary, having due regard to the need for confidentiality. The register will record the nature and outcome of each allegation.

12. Monitoring and reporting

The nature and outcome of each whistleblowing allegation will be reported to the Board, having due regard to the need for confidentiality. On an annual basis the Board will receive a report on activity within the scope of this policy or confirmation that there has been no such activity.

13. Staff and Board member training

All new staff and Board members will receive initial training on this policy and will receive annual reminders of the policy.

14. Equality statement

ECBHA has a duty to ensure that no person receives less favourable treatment from the organisation on the grounds of age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex or sexual orientation. This policy will be applied in line with our Equality and Diversity Policy. The policy will be made available in different formats on request.

15. List of contacts

The Regulator of Social Housing

Referrals and Regulatory Enquiries team

Level 2

7-8 Wellington Place

Leeds

LS1 4AP

Telephone: 0300 124 5225

Email: enquiries@rsh.gov.uk

ECBHA's internal auditor

ECBHA's external auditor

ECBHA's legal advisors

Protect

The Green House

244-254 Cambridge Heath Road

London

E2 9DA

Telephone: 0203 117 2520

On line: [Advice line contact form](#)

9.

C - Anti Fraud Bribery & Corruption Policy

1 Introduction and Statement

ECBHA is committed to the highest ethical standards and good governance. The conduct of board and committee members, staff, consultants, contractors and suppliers involved in

delivering ECBHA business is critical to achieving this. ECBHA meets the Regulator for Social Housing's (RSH) requirement to provide an annual report on any losses from fraudulent activity, and the NHF's Codes of Conduct and Governance which require housing associations to adopt and comply with appropriate policies and procedures to prevent fraud, bribery and corruption.

ECBHA will not tolerate fraud, bribery or corruption. It will take all allegations seriously and where it is found to be operating it will be investigated and appropriate sanctions applied.

ECBHA will always prosecute fraud, bribery and corruption and recover assets misappropriated, through the courts. To ensure the highest standards of probity, accountability and openness, all board members and employees should read this policy in conjunction with ECBHA's Standing Orders, Financial Regulations, Code of Conduct and Conditions of Employment.

ECBHA will provide and promote an anti-fraud, bribery and corruption working culture. Everyone within ECBHA is responsible for protecting the organisation against the risk of fraud, bribery and corruption and should ensure that they report any concerns immediately. ECBHA will develop and maintain effective controls for assessing the risk of and for reporting and investigating fraud, bribery and corruption and take measures to review systems and procedures in the light of experience to prevent the recurrence of fraud, bribery and corruption.

ECBHA requires all third parties involved through its procurement activities to comply with its policies or to have in place similar anti-fraud arrangements. ECBHA will not tolerate fraud, bribery or corruption in any form, including any internal action which gives advantage to any individual, group or organisation, regardless of whether there would be a financial benefit. In accordance with the adopted Code of Conduct, Staff, Board Members and certain involved residents must take all reasonable measures to protect the housing association's funds, resources, property and assets from fraud, theft, damage and misuse.

2 DEFINITIONS

Fraud-The Fraud Act 2006 lists 3 ways in which fraud can be committed by;

- False representation-dishonestly making a representation knowing or thinking it untrue or misleading.
- Abuse of power- dishonest abuse of a position expected to safeguard the financial interests of another person and
- Failing to disclose information-where there is a legal obligation to do so. 4 . Fraud is often divided into three categories:
- Internal fraud – perpetrated by people within an organisation, most often by those with access to moveable assets such as cash.
- External fraud – perpetrated by people outside the organisation. It includes theft, deception and computer hacking.
- Collusion – involves two or more parties who may be within the organisation, external or internal and external parties working together. In all types of fraud, an offence must have occurred, the person must have acted dishonestly and acted with the intent of making a gain for themselves or someone else or inflicting a loss (or a risk of loss) on another.

The Act also includes two supporting offences being the possession of articles for use in fraud (e.g. using a fake passport to prove identity) and the making or supplying of articles for use in fraud (e.g. supplying a fake passport). The maximum prison sentence for fraud is 10 years.

Bribery: The Bribery Act 2010 came into force on 1 July 2011, repealing and replacing the old laws on bribery with a new comprehensive anti-bribery code.

There are four offences:

- Bribing another person– the offering, promising, or giving of an advantage.
- Being bribed – requesting, agreeing to receive or accepting an advantage.
- Bribing a foreign public official.
- The "corporate offence", where a commercial organisation fails to prevent persons performing services on its behalf from committing bribery.

A bribe is given to influence the recipient's conduct. It may be money, goods, property, privilege, object of value, advantage or any or other inducement. The key element being this inducement is designed to influence the actions of an official in the organisation.

Some actions, such as abuse of position could be classed as either fraud or bribery or both, depending on the circumstances. In order not to commit the offence of failing to prevent bribery, organisations must be able to demonstrate they have adequate procedures in place to prevent bribery in line with the following six principles:

- Proportionality - action taken to prevent bribery should be proportionate to the risks faced and the size of the organisation.
- Top level commitment - those at the top are in the best position to ensure the organisation conducts business without bribery.
- Risk Assessment - understand the risks that could occur.
- Due Diligence - know who we deal with to prevent retaining people/organisations who might be less than trustworthy.
- Communication - communicate policies, procedures and offer appropriate training to staff and those who work with us to raise awareness and deter bribery.
- Monitoring and review - the risks ECBHA faces and the effectiveness of its procedures may change over time, so it is important they are regularly reviewed to monitor any changes in potential risks (i.e. when entering new markets).

Corruption: Abusing your position for direct or indirect personal gain by offering, giving, soliciting or accepting inducements designed to influence official action or decision making. The adopted Code of Conduct states that in your role with the housing association, you must not offer, seek or accept bribes or inducements to act improperly or corruptly.

3 ANTI – FRAUD, BRIBERY AND CORRUPTION APPROACH

ECBHA's Anti-Fraud, Bribery and Corruption approach is based on a series of interrelated procedures designed to frustrate any attempted fraudulent or corrupt act. This covers:

- Culture
- Preventing fraud
- Detecting and investigating fraud, bribery and corruption

- Speaking Up (Whistleblowing)
- Training
- Disclosure of interest
- Internal audits

4. TRAINING

ECBHA recognises that the continuing success of its anti-fraud, bribery and corruption policy and its general credibility will depend on the effectiveness of programmed training and responsiveness of employees throughout the organisation. In order to facilitate this, ECBHA supports the concept of induction training for new Board Members and employees and ongoing refresher courses, particularly for those involved in internal control systems.

5 DISCLOSURE OF INTEREST

Board Members will be required to comply with the RSH's Governance and Financial Viability Standard and any codes approved locally by the Board. A key part of this will be an annual declaration of interests.

Similarly requirements will be made of employees A register of interests will be maintained by the Company Secretary and will be available for public inspection.

All Board Members, Employees and Involved Residents are required to complete and sign an annual declaration of interest form. If a new interest occurs prior to the annual declaration, this must be declared immediately and not until the annual declaration.

The adopted Code of Conduct states that you must formally declare to the housing association, at the earliest 6 opportunity, any interests which may, or may be perceived to or may in the future, conflict with the duties of your role.

6. RESPONSIBILITIES

It is the responsibility of Directors and Managers to have in place and operate adequate systems of internal control within their areas of responsibility. This will help to prevent and detect fraud. Every member of staff has a duty to alert their Line Manager where they believe the opportunity for fraud exists because of weak procedures or lack of effective supervision.

Any actual or suspected fraud or suspicious acts should be reported to their Line Manager or Director.

For guidance staff should refer to the Speaking Up (Whistleblowing) policy. ECBHA wishes to encourage anyone having reasonable suspicions of fraud to report them. Therefore, no employee will suffer in any way as a result of reporting reasonably held suspicions. For these purposes 'reasonably held suspicions' means any suspicions other than those which are raised maliciously and found to be groundless.

If a member of staff discovers criminal activity by a colleague that does not directly affect ECBHA, there may still be a legal obligation to inform the police. Any member of staff who is uncertain of their obligations should seek advice from a director. If any member of staff has reasonable grounds for suspecting criminal or corrupt activity, even if they have no conclusive evidence ((refer to the Speaking Up (Whistleblowing policy) for protection rights)), they may still be subject to disciplinary procedures if they fail to report their suspicions.

7. REPORTING

Any discovery or suspicion of theft or fraud should generally be immediately reported to the Line Manager in the first instance. If the reporting staff member is suspicious of the Line Manager and or that a number of persons are involved in a suspected or actual fraud, they should report the incident directly to the Executive Director of Finance and Development.

If the line manager is the Executive Director of Finance and Development, then the member of staff should report their suspicions to the Chief Executive. Once notified by a staff member, the Line Manager should contact the Executive Director of Finance and Development. Under no circumstances should a Line Manager undertake their own investigation.

Once notified, the Executive Director of Finance and Development will make arrangements to undertake an initial investigation to gauge the severity of the situation. At this stage (s) he may act in conjunction with relevant Directors to make any immediate changes required to secure the situation (s.) He may also examine and remove any records required.

Immediately after this assessment, the following will be notified of the initial situation and of the proposed scope of any investigation:

- The Chief Executive
- The Chair of Audit & Risk Committee
- The RSH (if the loss is greater than £5,000 or any amount involving any board members or Directors)
- ECBHA's insurers if there is an insured loss.

For incidents involving third parties, it may be necessary to contact the police immediately. However, for internal frauds, the decision on when to involve the police will be made by the Chief Executive and Chair of Audit & Risk Committee.

The timing of the notification to the police will be at the discretion of the Chief Executive.

Generally, they will be involved after the circumstances have been investigated, unless the loss is likely to be substantial. The RSH will be updated if there is likely to be a loss which was previously grant ey may wish to recover the grant. Following the initial notification to the Chair of the Audit Committee, the Board will be appraised of the situation by a confidential verbal or written report at their next meeting.

The Board will be updated at subsequent meetings of any significant developments. On completion of the investigation, whatever the outcome, a confidential report will be presented to the Board and sent to the RSH (if appropriate). The fraud, bribery and corruption or attempted fraud, bribery and corruption will be recorded in the Fraud Register held by the Company Secretary. This Register will be presented to the Audit and Risk Committee on a regular basis. ECBHA are required to submit an annual fraud return to the RSH within 6 months of the financial year-end.

8. FRAUD, BRIBERY AND CORRUPTION RESPONSE

ECBHA will take all steps to:

- minimise the risk of subsequent losses,
- improve the chance and scale of recoveries,

- reduce any adverse commercial effects,
- demonstrate that ECBHA retains control of its affairs in a crisis,
- make a clear statement to employees and other parties that the organisation is not a “soft target” for fraud or attempted fraud. If the Executive Director of Finance and Development determines that it is possible that a fraud has taken place and the magnitude of the fraud warrants immediate action, steps will be taken to:
- Secure the assets at risk both directly or by notifying (for example) banks and other parties holding assets, by withdrawing signing authorities and by removing suspects from positions of authority.
- Secure accounting and other records, including those held on computer and take back ups of all relevant computer data.
- Change passwords and access controls.

Where necessary to ensure the investigation is not impeded, consult with the Chief Executive, Director of People and Culture and Company Secretary to arrange the immediate suspension or removal of suspects from the premises.

The Executive Director of Finance and Development is authorised to be given access to any information requested and have access to all staff with reasonable notice. If required, external specialist consultants or the police will be utilised, subject to approval of the Chief Executive or in his absence the Chair of the Audit & Risk Committee.

All information relating to the investigation will be confidential and held securely. Findings will not be released to third parties without the permission of the Chief Executive and the Chair of the Audit & Risk Committee.

D - Receipt of Gifts Policy.

1. Policy statement

It is the aim of the Association to ensure high levels of customer and client satisfaction. Occasionally, satisfied customers, clients or other third parties may seek to reward employees with gifts.

Whilst the Association has no desire to stop deserving employees receiving a small token of gratitude or appreciation from a customer or client, we do recognise that there is the potential for abuse. In addition, some suppliers or contractors may offer ‘reward schemes’ which allow employees to obtain free gifts or discount vouchers for ordering services or products on behalf of the Association from that supplier or contractor.

Obviously, the Association must ensure that its suppliers or contractors are competitive and that its employees are acting in the best interests of the Association when using a particular supplier or contractor.

The Association does not believe that it is appropriate for employees to accept anything of greater value than small tokens of appreciation from customers, clients, suppliers, contractors or from any other person or organisation with which the Association has, or might have, business connections.

This is because it is important to ensure that no employee acts in any way that is inconsistent with the integrity of the business by accepting a gift in circumstances where it could influence, or be seen to influence, that employee's business decisions or actions. For the purposes of this policy, a 'gift' is deemed to be any item given to an employee on an apparent ex gratia basis by any party in connection with the employee's employment by the Association. On no account should an employee accept any amount of money, no matter how small, from a tenant, contractor, supplier or service user.

2. Disclosure Requirements

The Association also promotes a culture of honesty and transparency in the practice of receiving gifts. All employees are under an obligation to report the receipt of gifts, including the nature of the gift and the identity of the sender, to the Chief Executive/COO as soon as they are received.

Failure to report the receipt of any gift from any party constitutes a disciplinary offence and will be dealt with in accordance with the Association's disciplinary procedure. Depending on the gravity of the offence, it may be treated as gross misconduct and could render the employee liable to summary dismissal.

If the gift is anything other than a small token of appreciation having no substantial financial value, the employee will be required to return the gift to the sender with a polite letter thanking them and explaining that it is the Association's policy that employees should not receive gifts.

If, in the opinion of the Chief Executive/COO, the gift might constitute a bribe or other inducement, the employee will be asked to pass the gift to The Chief Executive/COO of the Association who will return it to the sender with a suitable letter explaining the Association's policy and asking the sender to comply with the policy in future.

In cases where the Chief Executive/COO deem that the gift constitutes a small token of appreciation for the employee as a personal reward, the employee may, at the line Chief Executive/COO, be permitted to retain the gift. However, unless the sender of the gift specifically states or makes clear that the gift is intended for a particular employee as a personal reward, all gifts are deemed to be the property of the Association and may be shared amongst other members of staff or donated to a charitable cause as appropriate. Thus, small gifts that are genuinely given as a token of appreciation are acceptable, provided always that the employee properly declares the gift in line with this policy and provided they do not subsequently treat the sender of the gift more favourably than other clients, customers, suppliers or contractors.

If the Association discovers a supplier or contractor has been used wholly or mainly because of the incentive of a gift and, as such, the employee has not acted in the best interests of the

Association, this will also constitute a disciplinary offence and will be dealt with in accordance with the Association's disciplinary procedure.

Depending on the gravity of the offence, it may again be treated as gross misconduct and could render the employee liable to summary dismissal.

The receipt of all gifts will be closely monitored by the Association. This policy does not apply to promotional gifts i.e., items such as pens, mugs, calendars or stationery that bear the Association name or logo of another organisation, provided that these have no significant financial value