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**Title:** **Gifts, Hospitality and Legacies - Group Policy**

**Business Function:** **All Functions across Sanctuary Group**

**Author:** **Governance and Company Secretarial Department**

**Other Contributors:** **Group Facilities**  
**Group HR Services**

**Authorised by:** **Executive Committee**

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**Sanctuary Group:**  
**Sanctuary Group is a trading name of Sanctuary Housing Association,**  
**an exempt charity, and all of its subsidiaries.**

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## 1. Policy statement

- 1.1 Sanctuary Group (the Group) is committed to providing the best possible service at all times whilst protecting its staff, board members and service users from any kind of exploitation, particularly those who may be considered most vulnerable.
- 1.2 The Group recognises it has a duty to ensure those involved in delivering the Group's business activities (for example, staff, board members, consultants and agents) do not give or accept personal gifts and hospitality from service users and their families, contractors or suppliers. It must be recognised that the receiving of personal gifts or hospitality is inappropriate and can potentially compromise the professional relationship or may be perceived as compromising personal judgement. This policy also states that staff are prohibited from any involvement with service users' wills.
- 1.3 Failure to comply with the principles of this policy or the signing of a false declaration are considered disciplinary offences. This may result in instant dismissal, as it constitutes a failure to adhere to the standards of conduct necessary for staff employed by the Group. For board members, this may result in the withdrawal of membership.
- 1.4 The purpose of this policy is therefore, to state the Group's position on the acceptance of gifts and what is considered as acceptable hospitality, so that staff and board members are not open to any form of bribery or influences from third parties, which may affect the Group in any way.
- 1.5 This policy and the associated procedure must be read in conjunction with the [Professional Boundaries policies and procedures](#) and [Prevention of Bribery - Group Policy and Procedure](#). For board members, this must also be read in conjunction with the [Sanctuary Group Governance Manual](#).

## 2. Roles and responsibilities

- 2.1 Directors and board members are responsible for ensuring adoption of, and adherence to, this policy and its associated procedures relevant to their operation.
- 2.2 All staff have the responsibility to inform their Line Manager of any gifts, hospitality, or legacies that are offered to them by service users and their families, contractors, suppliers and any person linked to the Group. All board members have a responsibility to inform the chairman of the board or the Group Chief Executive.
- 2.3 Line Managers are responsible for ensuring that line reports follow this policy and procedure, and that any gifts or hospitality that are offered to staff members, or given on behalf of the Group, are approved in accordance with the procedure and declared to Governance and Company Secretarial within four working days using the [Gifts and Hospitality Declaration Form](#).

2.4 Governance and Company Secretarial are responsible for recording declarations in the Group's Gifts and Hospitality Register.

### 3. References and sources

- [Disciplinary - Group Policy and Procedure](#)
- [Group Financial Regulations](#)
- [Sanctuary Group Governance Manual](#)
- [Prevention of Bribery - Group Policy and Procedure](#)
- [Professional Boundaries policies and procedures](#)
- [Sanctuary Group Staff Handbook](#)
- [Group Standing Orders](#)
- [Bribery Act 2010](#)
- [Housing Act 1996](#)
- [Housing and Regeneration Act 2008](#)
- [Care Standards Act 2000](#)
- [National Housing Federation Code of Conduct 2012](#)

### 4. Impact on diversity

4.1 This policy applies to all staff and board members as outlined above.

4.2 Sanctuary Group demonstrates its commitment to diversity and promoting equality by ensuring that this policy is applied in a manner that is fair to all sections of the community, with due regard to the protected characteristics identified under the Equality Act 2010 and in accordance with its 'Fairness for All' Single Equality Scheme.

### 5. Resident consultation

5.1 This policy, and its associated procedure is for internal use only; therefore, resident consultation was not undertaken.

### 6. Monitoring and compliance

6.1 The gifts and hospitality corporate registers are inspected quarterly by the Company Secretary and annually by the Group Audit Committee.

6.2 Period of review

6.2.1 Until a new policy is formally adopted this document will remain in force and operational.

6.2.2 This policy will be reviewed in accordance with the policy review programme agreed by Executive Committee.

6.2.3 If there are significant changes to legislation or regulation or there are found to be deficiencies or failures in this policy, as a result of complaints or findings from any independent organisations, the Group Director - Corporate Services will initiate an immediate review.

6.2.4 Where appropriate, key stakeholders, residents and interested parties will be consulted as part of any review of this policy.

## **7. Approval**

7.1 This policy is approved by the Executive Committee of Sanctuary Group.

## **8. Operational arrangements**

8.1 This policy must be used in conjunction with the [Gifts, Hospitality and Legacies - Group Procedure](#).