
Sanctuary Group

Title: Gifts, Hospitality, and other Benefits - Group Policy

Business Function: All Functions across Sanctuary Group

Author: Governance and Company Secretarial

Other Contributors: Group Facilities
People Services

Authorised by: Executive Committee

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 or, in the case of staff and board members, a personal gain as a result of the relationship between themselves and a service user or their position within the Group.
- 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. The duty extends to ensuring that the Group does not offer staff or their close connections non-contractual benefits (this covers the offer of employment, housing and the sale of property) without the relevant prior authorisation as set out in the associated procedure. It must be recognised that to do so 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 The purpose of this policy is therefore, to state the Group's position on gifts, hospitality and other non-contractual benefits and detail what is considered as acceptable and unacceptable, so that staff and board members are not open to any form of bribery or influences from third parties, or do not benefit from their position within the Group.
- 1.4 Failure to comply with the principles of this policy and procedure, or the signing of a false declaration is 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 board membership.
- 1.5 This policy and the associated procedure must be read in conjunction with the, [Professional Boundaries - Care Policy](#) and [Prevention of Bribery - Group Policy and Procedure](#).
- 1.6 For board members, this must also be read in conjunction with the Governance Manual which can be found on [Governance and Company Secretarial Home Page](#).

2. Roles and responsibilities

- 2.1 Directors are responsible for ensuring adoption of, and adherence to, this policy and its associated procedure relevant to their operation.
- 2.2 Staff are responsible for informing their Manager of any gifts or hospitality that are offered to them by service users and their families, contractors, suppliers and any person linked to the Group, as well as non-contractual benefits (covering the offer of employment, housing and the sale of property) that relate to them or their Close Connections (see procedure for definition). All board members are responsible for informing the Chairman of their board or the Group Chief Executive.

- 2.3 Managers are responsible for ensuring that any gifts or hospitality offered to staff, or given on behalf of the Group, or any offer of non-contractual benefits are approved in accordance with this policy and procedure and declared to Governance and Company Secretarial as necessary.
- 2.4 Managers and staff are responsible for ensuring that all necessary approvals have been obtained, and Governance and Company Secretarial is responsible for ensuring that all declarations are recorded in the Group's central registers (Gifts and Hospitality Register and Benefits Register).
- 2.5 All parties must ensure that their actions are conducted in line with Group policies and that no preferential treatment or personal gain is offered or accepted.

3. References and sources

- [Disciplinary - Group Policy and Procedure](#)
- [Group Financial Regulations \(England\)](#)
- [Financial Regulations - Scotland](#)
- [Governance and Company Secretarial Home - Governance Manual](#)
- [Prevention of Bribery - Group Policy and Procedure](#)
- [Professional Boundaries - Care](#)
- [Professional Boundaries - All Supported Living](#)
- [Sanctuary Group Staff Handbooks](#)
- [Standing Orders - England](#)
- [Standing Orders - Scotland](#)
- [Bribery Act 2010](#)
- [Housing Act 2004](#)
- [Housing and Regeneration Act 2008](#)
- [Care Standards Act 2000](#)
- National Housing Federation Code of Conduct 2022 - detailed within the Sanctuary Group Governance Manual.

4. Impact on diversity

- 4.1 This policy applies to all staff and board members as outlined.
- 4.2 The 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 the '[Sanctuary Inclusion for All Strategy](#)'.

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 Group's Gifts and Hospitality Register and Benefits Register is inspected quarterly by the Company Secretary, and annually by the Group Audit and Risk Committee.
- 6.2 Period of review
 - 6.2.1 This document will remain in force and operational until a new policy is formally adopted.
 - 6.2.2 This policy will be reviewed in accordance with the policy review programme agreed by the Group's Executive Committee.
 - 6.2.3 The Executive Director - Corporate Services will initiate an immediate review 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.
 - 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 Sanctuary Group's Executive Committee.

8. Operational arrangements

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