

For Approval

Agenda Item: 12.3
Date of Meeting: 25/03/26

To: The Management Committee
From: The Director
Subject: Review of Gifts & Hospitality Policy

1. Introduction and Purpose

- 1.1 As Committee is aware this policy was originally due for review in September 2025, as per the Policy Review Timetable 2025/26. However, it was decided that it would be put on hold until the revised Model Entitlements, Payments and Benefits Policy (EPB Policy) was published by SFHA. The revised Model was only issued by SFHA in January 2026 and was approved by Committee at its meeting later that month.
- 1.2 The purpose of this report is to present the proposed changes to the Gifts & Hospitality Policy, in light of the revised EPB Policy for Committee's consideration and approval.

2. Review of Gifts and Hospitality Policy

- 2.1 The current Policy and a track change version are available on the board portal as follows:

Resources > Policies > Policy Reviews 2025/26 > Policies for Review March 2026 > Gifts and Hospitality Policy Mar 2026

- 2.2 Attached is the clean version of the revised Policy with the main changes highlighted in yellow.

- 2.3 A summary of the main changes to the Policy are as follows:

Section 4: Our Values – updated to reflect new values identified by Committee at the business planning day in November.

Section 6: Gifts and Hospitality offered to our People –

- the value of gifts has been increased to £70 in line with revised EPB Policy;
- the number of gifts from the same source in any given 12 month period, has increased from 2 to 3;

- Para 6.1.5, 1st bullet point – additional wording “or will form part of our annual charity fund raising activities”
- Para 6.1.6, new wording added to reflect EPB Policy - “This restriction is intended to protect our people from any suggestion of impropriety in how they conduct themselves when acting on our behalf. The total cumulative value of gifts received from the same source over the course of a year must never exceed £70. Our People should also record any offers that they decline and the reasons for this, in the register within five days.”
- Subsection “Rosehill Events”, para 6.1.8 – amendments made including new wording to tie in with EPB Policy. Currently gifts received by contractors at Christmas, form a free prize raffle for staff. However, to keep in line with the EPB Policy and Governing Body Members’ Guide, this will now be a prize draw to raise money for a charity of staff’s choice.
- Section 7: Gifts and Hospitality provided by Rosehill – deletion of current paras 7.1.2 and 7.1.5 and inclusion of new paras numbered 7.1.2 – 7.1.5 to be in line with Appendix 1 of the EPB Policy;
- Section 12: Risk Management – updated to reflect current name of sub-committee – Audit & Risk and inclusion of Management Committee re: management of risk.
- Section 13: Equalities and Human Rights – existing Equalities section updated with corporate statement on Equalities and Human Rights.

2.4 In general any references to “Director” have been updated to “Chief Executive”.

2.5 In relation to the Equalities and Human Rights section, Committee must decide which of the two options shown in the draft revised Policy should be in the final version. I would suggest that as the Policy applies to everyone that it is the second option:

“As this policy applies equally to all groups, Rosehill (with committee approval) made the decision not to carry-out an Equality Impact Assessment on this policy.”

3. Risk

3.1 We have considered risk in relation to gifts and hospitality and have identified the main risks under the following risk categories:

Risk Category	Mitigating Measure
Governance: Committee and staff unclear as to what gifts and hospitality are allowed;	Having an up-to-date Policy governing Gifts and Hospitality

Acceptance of inappropriate gifts and hospitality;	which is in line with our EPB Policy; Policy easily accessible by Committee and Staff Maintaining of Gifts and Hospitality Register (all gifts and hospitality even those below threshold allowed and those refused are entered in Register)
Legislative and Regulatory: Breach of our Gifts and Hospitality Policy Breach of Regulatory Requirements (Standard 5)	As above
Reputation: Rosehill's integrity called into question; Public perception of wrong doing	As above

4. Delivery of our Strategic Objectives

Area	Related Strategic Objective(s)
Review of Gifts & Hospitality Policy	7) Achieve the highest standards in all that we do

5. Application of our Core Values

Area	Related Core Value(s)
Review of Gifts & Hospitality Policy	<ul style="list-style-type: none"> Accountable and Compliant Excellent and Committed

6. Compliance and Assurance

- 6.1 Ensuring we have a clear policy in place to govern offers of gifts and hospitality and how we manage these, means we are meeting Regulatory requirements with particular reference to the following:

Compliance Source	Details
The Standards of Governance and Financial Management for RSLs	<p>Standard 5 - The RSL conducts its affairs with honesty and integrity.</p> <p>Guidance 5.1 - The RSL conducts its affairs with honesty and integrity and, through the actions of the governing</p>

	<p>body and staff, upholds the good reputation of the RSL and the sector.</p> <p>Guidance 5.4 - Governing body members and staff declare and manage openly and appropriately any conflicts of interest and ensure they do not benefit improperly from their position.</p>
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6.2 Evidence Bank

Evidence	Assurance Exercise Location
<ul style="list-style-type: none"> Report for Committee Meeting on 25/03/26 Revised Gifts & Hospitality Policy 	Regulatory Standard 5 – Guidance 5.1 and 5.4

6.2.1 Committee is reminded that our Assurance Exercises are available in the Committee Log-in Area of our website, which Committee can access at any time.

7. Summary

7.1 The review of the Gifts & Hospitality Policy was postponed (due in September) until the revised Model EPB Policy was published by SFHA. The Model EPB Policy was issued by SFHA in January 2026 and adopted by Committee at its January meeting.

7.2 The Gifts & Hospitality Policy has been reviewed in light of the revised EPB Policy, which has resulted in some changes, which are set out in Section 2.

7.3 Risk has been considered at Section 3.

7.4 Section 4 shows how reviewing the Gifts & Hospitality Policy, contributes to the delivery of our strategic objectives.

7.5 Section 5 shows how reviewing the Gifts & Hospitality Policy, contributes to the application of our Core Values.

7.6 Section 6 sets out how we comply with Regulatory requirements.

7.7 Committee is asked to consider this report and the draft revised Gifts & Hospitality Policy. Committee is further asked to decide on the following:

- To approve the revised Gifts & Hospitality Policy
- What option, from the following, should be included in the Equalities and Human Rights Statement:

13.1 In accordance with our Equality and Human Rights Policy, we have carried out an EIA on this policy which is appended to the end of this policy.

or

13.1 As this policy applies equally to all groups, Rosehill (with committee approval) made the decision not to carry-out an Equality Impact Assessment on this policy.