
Code of Conduct for Board members

1. Background

- 1.1 The Board is responsible for the overall control of the affairs of Rochdale Boroughwide Housing Limited (the Company). This includes providing direction and ensuring that the aims and objectives of the Company are met, monitoring the performance, effectiveness and efficiency of all the Company's functions, ensuring the financial viability of the company and overseeing the procurement of resources to enable the meeting of financial and other obligations.
- 1.2 This Code of Conduct applies to all Board members. Its purpose is to affirm the Company's commitment to the highest standards of governance, in line with the Companies Act 2006.
- 1.3 The following information and issues are dealt with in detail in the Memorandum and Articles of Association.
- size and composition of the Board
 - powers of the Board
 - appointment, removal and retirement of Board members, and the Chair and Vice Chair of the Board.
 - disqualification of Board members.
 - proceedings and voting at Board meetings.
 - resolutions
 - indemnity for Board members

2. Governing Principles

- 2.1 Rochdale Boroughwide Housing is committed to conducting its business in an open, proper and accountable manner with a clear decision making and delegation process consistent with the requirements of statute and of best practice.
- 2.2 The Company's business will always be legal. The Company is committed to strict compliance with those laws and regulations which govern its business activities.
- 2.3 Unless there are reasons of confidentiality information about the Company, its policies and procedures, areas of operation, management, its Board and employees and minutes of Board meetings should be made available to the public.
- 2.4 The Board will publish an annual report of the Company's activities and performance.

3 Functions of the Board

3.1 The core functions of the Board are to:

- define the core values and objectives of the company and ensure that policies and procedures are in place to achieve these objectives.
- observe the highest standards of propriety, impartiality, integrity and objectivity
- maintain overall control of the Company's affairs.
- take an active and informed role in the management of the Company.
- monitor the performance, effectiveness and efficiency of the Company's operations on a regular basis.
- establish a system of financial control.
- approve the annual budget, business plan and accounts.
- examine and approve new business development opportunities.

3.2 The specific responsibilities of the Board are to:

- appoint (and if necessary dismiss) the Chief Executive and Directors
- appoint (and if necessary dismiss) the Company Secretary
- establish a process of delegation of powers to sub committees and Directors
- ensure compliance with the Management Agreement between the Company and Rochdale Metropolitan Borough Council
- approve new policies
- ensure the procurement of sufficient funding
- address any allegations or instances of fraud
- review its own performance and effectiveness on an annual basis

4. Statement of Responsibilities

4.1 Each Board member is required to sign a Statement of Board member Responsibilities. These are attached at Appendix 1. These statements will be retained by the Company Secretary.

4.2 Before final appointment to the Board, nominated Board members must complete a Declaration Form. No Board member must be disqualified by a court from acting as a company director or be an undischarged bankrupt. The Declaration Form is attached at Appendix 2 and must be returned to the Company Secretary.

4.3 The general duties of directors are:

- a) the duty to act within powers – a director of the company must act in accordance with the company's constitution and only exercise powers for the purposes for which they are conferred
- b) the duty to promote the success of the company – a director of a company must act in the way he/she considers, in good faith, would be most likely to promote the success of the company for the benefit of its members as a whole and in doing so must have regard to a number of statutory factors.
- c) the duty to exercise independent judgment
- d) the duty to exercise reasonable care, skill and diligence
- e) the duty to avoid conflicts of interest – a director of a company must avoid a situation in which he/she has, or can have, a direct or indirect interest that conflicts, or possibly may conflict, with the interests of the company.

- f) the duty not to accept benefits from third parties – a director of a company must not accept a benefit from a third party conferred by reason of his/her being a director or his/her doing (or not doing) anything as a director.
- g) the duty to declare interest in proposed transaction or arrangement – if a director of a company is in any way directly or indirectly interested in a proposed transaction or arrangement with the company, he/she must declare the nature and extent of that interest to the other directors.

5. Chair of the Board

5.1 The essential functions of the Chair of the Board are to:

- ensure the effective and efficient conduct of the business of the Board and the general meetings
- guide meetings through the items on the agenda and ensure the minutes contain an accurate record of the decisions reached
- ensure that the Board, in reaching decisions, takes proper account of relevant legislation, guidance, circulars and reports.
- adjourn a meeting when required in line with the Memorandum and Articles of Association
- agree agendas of forthcoming meetings with the appropriate officer
- ensure the Board delegates sufficient authority to its sub committees to carry out appropriate business
- ensure the Board and its sub committees receive appropriate professional advice as required.
- ensure that all Board members on taking up post are fully briefed on the terms of their appointment and on their duties, rights and responsibilities.
- develop an effective and constructive working relationship with the Chief Executive and other senior officers
- ensure the Chief Executive is appraised on an annual basis
- represent the views of the Board to the general public
- represent the Company on appropriate occasions

6. Conduct and probity

6.1 Board members should ensure that they uphold the highest standards of conduct and probity and work in line with the Companies Act 2006, the Memorandum and Articles of Association and the Company policies and procedures.

6.2 Each Board member is independently and collectively responsible for the decisions and conduct of the Board. Board members must consider issues before them in an objective manner and at all times remain independent in their views

7. Openness and responsiveness

7.1 Board members should conduct all their dealings with the public in an open and responsive way.

7.2 Wherever appropriate the Board should make provision for access to records of their decisions and that of any area board, committee or sub- committee, and should publicise the arrangements made.

- 7.3 All Board members must be as open as possible about the decisions and actions that are taken in the performance of their duties when called upon to do so and restrict supplying information only in accordance with the Company's confidentiality policy.
- 7.4 The Board will publish an annual report, including a business review, and annual accounts.
- 7.5 The provisions of this paragraph 7 are subject to both the Board member responsibilities set out in paragraph 4.3 and the requirements concerning confidentiality set out in paragraph 8.

8. Confidentiality

- 8.1 Confidential information includes information relating to the business, policy, organisation, management, operations, development, marketing, customers, suppliers, financial affairs, personnel and employment matters of the Company, and other information directly or indirectly relating to the business of the Company and not generally known to the public.
- 8.2 All Board members must maintain the confidentiality of such information and must not provide such information to third parties unless they are entitled to receive it.
- 8.3 Board members must comply with the Company's Confidentiality Policy.

9. Media Relations

- 9.1 Board members should not discuss any matters relating to the Company with any representative of the media unless specifically authorised to do so.
- 9.2 Board members should not publish any statement concerning the Company on a website, electronic notice board or by any other methods of electronic communication without the prior approval of the Chair.

10. Registration of Financial and other interests

- 10.1 Upon appointment to the Board, a Board member must register his financial interests in writing to the Company Secretary for inclusion in the Company's Register of Board members Interests. The Board member should complete the relevant form attached at Appendix 3.
- 10.2 Upon appointment to the Board, a Board member must register his other interests in writing to the Company Secretary for inclusion in the Company's Register of Board members Interests. The Board member should complete the relevant form attached at page 13.
- 10.3 A Board member must, on becoming aware of any changes to the interests specified in 10.1 and 10.2 above, provide written notification of that change to the Company Secretary.

11. Conflicts of Interest

- 11.1 Board members shall not have outside interests which conflict with the best interests of the Company. Board members are expected to act solely for the Company and not be influenced by personal interest which may result from other individual or business concerns.
- 11.2 Board members private or personal interests must not influence their decisions and they must not use their position to obtain personal gain of any sort or gain for friends or family associates' etc.
- 11.3 In circumstances where a Board member or his/her family member, friend associate etc. could receive personal or business benefit as a consequence of any of the Company's activities the Board member must make a declaration of interest using the form attached at Appendix 4.
- 11.4 Board members must disclose any direct or indirect pecuniary and non-pecuniary interests relating to themselves or close family members or persons living in the same household as the Board member.
- 11.5 Board members must disclose any direct or indirect pecuniary interest in any contracts or business being considered by the Company.
- 11.6 If during any Board meeting or sub committee an item arises in which the Board member could be regarded as having an interest, the Board member must declare this interest and the extent of the interest before the matter is discussed, and unless the interest is of a type specified in the Articles 31(2) or 31(3) they must withdraw from the meeting for the duration of the item unless asked to remain by members of the Board or committee of the Board.
- 11.7 The Company will maintain a Register of Board members Interests. This will be held by the Company Secretary and be open to public inspection. Board members should declare any interest using the form attached at page 19.
- 11.8 Types of Interest
- Indirect pecuniary interests arise from connections with bodies that have a direct pecuniary interest or from being a business partner of, or being employed by, a person with such an interest.
 - Non pecuniary interests include those arising from membership of clubs and other organisations.
 - Close family members include personal partners, parents, children (adult and minor), brothers, sisters and the personal partners of these.

12 Gifts

- 12.1 The receipt of gifts and hospitality are subject to restriction and any that are accepted must be declared and recorded by the Company Secretary.
- 12.2 The receipt of gifts or favours by Board members may be seen as improper inducement to grant some concession in return to the donor. Board members should refrain from the offer of or receipt of improper payment. Nothing should be

given or received which could compromise either the Company or themselves personally or damage the Company reputation.

- 12.3 Gifts or favours will not be solicited, received, offered or given. Gifts of money will never be accepted. Reasonable small tokens and hospitality such as calendars, pens etc. may be acceptable provided they do not place the recipient under any obligation, are not recurring or systematic and are not capable of being misconstrued.
- 12.4 Board members will not place themselves under an obligation that might influence, or be perceived to influence, the conduct of their duties. Members should not accept personal gifts with an above nominal monetary value or hospitality if they could be perceived as exerting improper influence over the Company's decisions.
- 12.5 Any gift which is offered to a Board member but is intended for the Company should be referred to the Chair of the Board who will decide if the gift can be accepted. The Chair must ascertain that in accepting the gift this cannot be perceived as a way of exerting improper influence over the Company. The Chair will decide on how Company gifts should be distributed. A full record of all Company gifts should be recorded.
- 12.6 Any gift of more than nominal value, irrespective of acceptance, must be reported in writing using the form attached at page 21, to the Company Secretary together with the name of the donor, for inclusion on the Company's register of gifts and hospitality.

13. Hospitality

- 13.1 Board members can only accept hospitality if it is of a modest nature such as a working lunch or a general invitation to attend a company sponsored event. Hospitality should not be accepted which is lavish in nature, such as free travel, hotel accommodation, or holidays etc.
- 13.2 Hospitality should not be accepted if it implies any form of obligation to the individual or organisation who offers it. No hospitality can be accepted if it is likely to affect the impartiality of the Board members in carrying out the Company's business.
- 13.3 Hospitality from a company or organisation in the process of bidding or tendering for work can only be accepted with the consent of the Chair of the Board.
- 13.4 All hospitality accepted must be reported in writing using the form attached at appendix 5, to the Company Secretary, together with the name of the donor, for inclusion on the Company's gifts and hospitality register.

14. Inside Information

- 14.1 Information received by a Board member in the course of business dealing should not be used for personal gain or any purpose except that for which it is intended.

15. Business Monitoring and Control

15.1 The Board will take steps to provide for:

- (i) the maintenance of proper accounting methods and the reliability of financial information used within the business or for publication;
- (ii) the safeguarding of assets against unauthorised use or disposition;
- (iii) the maintenance of books and records which fully and fairly reflect all receipts and expenditures of the Company and are prepared in accordance with the relevant accounting principles.

16. The Board as Employer

16.1 The Board should ensure that; in line with the Management Agreement;

- it complies with all relevant legislation and the Company's employment policy
- the Company adopts management practices which use resources in the most economical, efficient and effective manner.
- the Company rules for the recruitment and management of staff provide for the appointment and advancement on merit on the basis of equal opportunity for all applicants and staff.
- Board members and staff have appropriate access to expert advice and training opportunities in order to enable them to exercise their responsibilities effectively.
- the Board annually reviews the performance of the Chief Executive and other senior management.

17. Speaking up

17.1 Board members must promote and support this Code of Conduct by leadership and example.

17.2 Board members who know (or have genuine suspicions) of any breaches of the Code of Conduct or any legal violation in relation to the work of the Company must report such matters promptly to the Chair of the Board and the Chief Executive, in line with the Company's Board Member Disciplinary Procedure.

18. Equality of Opportunity

18.1 The Company is committed to equal opportunities and will strive to uphold and promote this principle in all areas of its work.

18.2 The Board will ensure that the Company, the Board itself and the employees adhere to the Company's Equal Opportunities policy at all times and that the Company conducts its business in accordance with the principles outlined within it.

19 Investigating Breaches and Complaints

19.1 To protect the integrity of the Board and the reputation of the Company, all complaints and alleged breaches of the Code of Conduct will be investigated in accordance with the Company's Board member Disciplinary Procedure,

19.2 The Chair of the Board and the Chief Executive will investigate alleged breaches of the Code. A meeting of the Disciplinary Panel will be convened when it is considered that there is a case to be answered.

20. Board Member Disciplinary Procedure

20.1 This procedure deals with breaches of good governance in line with Article 18 (17). (The Council Member, as sole member of the Company, does have power to remove any Board member in line with the Article 13 but these do not specifically relate to disciplinary matters).

20.2 Board members bring a variety of skills and opinions to the organisation. Challenge is a positive thing and part of the role of Board members is to hold the Executive Management Team and the Chair of the Board to account. Individual Board members or groups of Board members may have differing views on issues and this is recognised as a positive and healthy contribution to the decision making process. Disagreement and challenge when issues are being discussed are not grounds for action when conducted in an appropriate manner in line with the Board member Ground Rules.

21. Contravention of Good Governance

21.1 Serious breaches

There are circumstances where immediate action is required to protect the integrity of the Board and the reputation of the Company. In line with the requirements of the Companies Act 2006, Board members carry special duties of accountability and, as a consequence, their conduct and personal integrity must always be beyond reproach. For this reason, any Board Member who:

- Becomes subject to legal proceedings brought against him/her by the Company or the Council;
- Brings legal proceedings against the Company or the Council; (excluding personal injury claims) or
- Becomes subject to any criminal or civil proceedings, the nature of which could compromise his/her position as a Board Member,

shall immediately, without prejudice of any outcome, become suspended from membership of the Board. This suspension will be carried out by the Chair of the Board in consultation with the Chief Executive, unless the Chair is the Board Member in question and in which instance the suspension shall be carried out by the Vice Chair in consultation with the Chief Executive. Upon the conclusion of any such action, the procedure set out in section 2 will be followed to determine whether there has been a proven disciplinary breach and whether to reinstate or seek the permanent removal of the Board Member.

21.2 Breaches

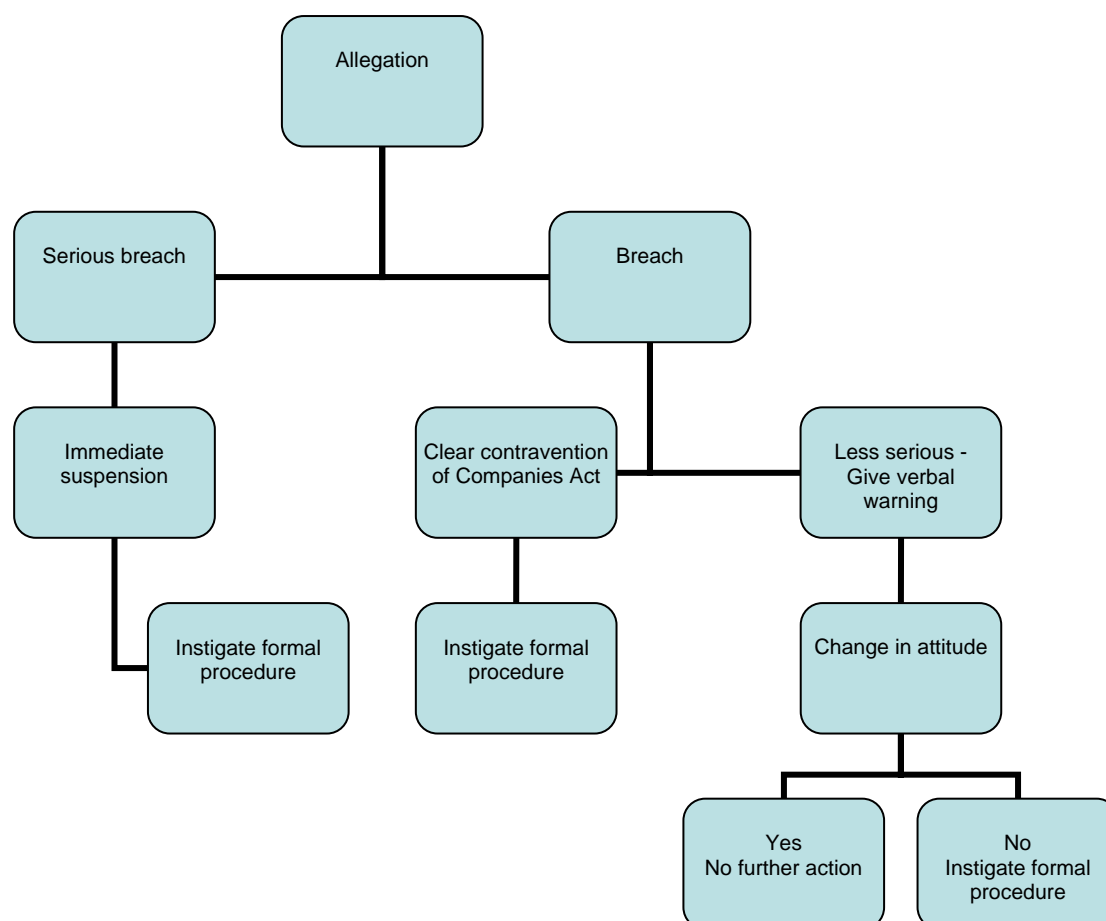
Other breaches may be deemed to include, but are not restricted to:

- Failure to avoid a conflict of interest
- Acceptance of benefit from a third party
- Failure to declare interest (including the extent of this interest)
- Failure to correct a false statement in a directors' report
- Actions or statements resulting in contravention of the Company's policies

- Failure to declare position as Company director, as appropriate, at a meeting of another body of which the person is a member or director.
- Failure to support the Company Board decisions.

22. The Procedure

Any allegation of Board member misconduct will be reported in writing to the Chair of the Board who will, in consultation with the Chief Executive, instigate an initial investigation into the allegation.



- If the Chair and Chief Executive are satisfied that there is a case to answer then the Chair will request that the Governance Manager informs the Board member that an allegation has been made.
- The Governance Manager will then convene a meeting of the Disciplinary Panel and advise the Board Member of the date and time of the meeting.
- No disciplinary action will be taken against a Board member until the case has been fully investigated and the Board member has had a chance to answer the case.
- Prior to any hearing, the Board member will be advised that he/she has the right to be heard and, if he/she chooses, to be represented.
- The Chief Executive will prepare the case for presentation to the Disciplinary Panel.
- The Disciplinary Panel will consist of the Chair of the Board (or Vice Chair in the absence of the Chair), two other Board members and the Company Secretary as advisor to the Panel. If the case involves the Chair, the Disciplinary Panel will consist of the Vice Chair of the Board and two other Board members.

- The meeting will be convened to hear and consider the allegations which will be presented by the Chief Executive.
- All papers to be referred to at the hearing, together with the names of any witnesses should be submitted to the Governance Manager by both the Board member and the Chief Executive 10 working days before the date of the hearing (unless a shorter period has been agreed).
- Copies of all papers will be distributed by the Governance Manager to all parties involved 5 working days prior to the hearing taking place (unless a shorter period has been agreed).
- The Panel will hear the full facts of the allegations made against the Board member and allow the Board member to state his/her case.
- The Chief Executive and the Board member may call witnesses to give evidence. These witnesses can include the complainant.
- The Governance Manager will act as Clerk to the Panel.

23. The Hearing

At the hearing:-

- The allegations against the Board Member will be presented by the Chief Executive (including the evidence of witnesses if appropriate);
- the Board Member, or their representative, will be allowed to question the Chief Executive or witnesses;
- the Panel Members may question the Chief Executive or witnesses;
- the Board Member, or their representative, will present his/her case calling any witnesses;
- The Chief Executive may question the Board Member and/or witnesses;
- The Panel members may question the Board Member and/or witnesses;
- The Chief Executive and the Board Member, or their representative, will make final submissions.

The Panel will then retire to consider the matter and will present its decision.

24. Findings

Where, in the opinion of the Disciplinary Panel, the allegation is proven and having regard to the seriousness of the misconduct and any previously proved misconduct, the following may apply:-

- Require a Board member to issue a formal and/or public apology
- Suspend a Board member for a fixed or indeterminate period
- Remove some or all of a Board member's special or additional responsibilities (above and beyond those of a normal Board member)
- First written warning:- for instances of serious misconduct or repetition of minor misconduct. A first written warning shall remain on the Board member's record for a period of 12 months.
- Final written warning:- for instances of misconduct following a written warning. A final written warning shall remain on the Board member's record for their full term of office.
- Removal from the Board – for instances of gross misconduct or further misconduct following a final written warning

25. Notification of Disciplinary Decisions

The Disciplinary Panel will instruct the Governance Manager to notify the Board Member of its decision/recommendation within three days of the Panel meeting. The notification will include details of the right of appeal, which will be to the full Board.

Rochdale Council, as sole member, will be notified of any disciplinary action taken against Board members. The following will also be notified:

- In the case of an Independent Board Member – the individual only
- In the case of a Tenant Board Member – the individual and the Tenants Federation
- In the case of a Council Board Member – the individual and the leader of the relevant political group: and for sanctions resulting in written warnings and above, the leader of the relevant political group, the Council's Chief Executive and the Borough Solicitor.

26. Appeals

A Board Member has the right to appeal a decision of the Disciplinary Panel to be heard by the full Board.

Any appeal shall be in writing indicating the initial grounds for the appeal and lodged with the Governance Manager within ten working days of the decision of the Disciplinary Panel. The Governance Manager will fix a date for the appeal, notify the Board Member and convene a meeting of the full Board for the purpose of the appeal. Appeals will be conducted so far as possible in accordance with the procedure set out in Paragraph 2 above. The Company Secretary will act as advisor to the Board and the Governance Manager will act as Clerk to the Board in relation to the appeal.

27. Review

This Code of Conduct will be reviewed every 5 years.

CODE OF CONDUCT FOR BOARD MEMBERS

APPENDIX 1

BOARD MEMBER STATEMENT OF RESPONSIBILITY

As a Board member of Rochdale Boroughwide Housing Limited, I will ensure, to the best of my ability, that my decisions and actions are always taken in the best interests of the Company. I agree to act in accordance with the Company's Memorandum, Articles of Association and Governance policy and uphold the individual and collective responsibilities of a Board member.

Key areas of responsibility include:

- defining the core values and objectives of the Company and ensure that policies and procedures are in place to achieve these objectives.
- observing the highest standards of propriety involving impartiality, integrity and objectivity
- maintaining overall control of the Company's affairs.
- taking an active and informed role in the management of the Company.
- monitoring the performance, effectiveness and efficiency of the Company's operations on a regular basis.
- establishing a system of financial control.
- approving the annual budget, business plan and accounts.
- examining and approve new business development opportunities.
- ensuring compliance with the management agreement between the Company and Rochdale Metropolitan Borough Council
- approving new policies
- ensuring the procurement of sufficient funding
- addressing any allegations or instances of fraud
- reviewing the Boards performance and effectiveness on an annual basis

Signed **Dated**

Board member of Rochdale Boroughwide Housing Limited

CODE OF CONDUCT FOR BOARD MEMBERS

APPENDIX 2

ROCHDALE BOROUGHWISE HOUSING LIMITED

DECLARATION OF BOARD MEMBER DETAILS

NAME: Title Honours etc.
Forename(s)
Surname
Previous forename(s).....
Previous surname (s)

DATE OF BIRTH:

NATIONALITY:

ADDRESS:
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Post Town

County/Region..... Post Code

Country

BUSINESS OCCUPATION:

OTHER DIRECTORSHIPS:
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I declare that:

- (a) I have not been disqualified by a court from acting as a company director,
- (b) I am not an undischarged bankrupt.
- (c) The above information is correct to the best of my knowledge and belief

Signed

Dated

CODE OF CONDUCT FOR BOARD MEMBERS

APPENDIX 3

ROCHDALE BOROUGHWIDE HOUSING LIMITED

REGISTER OF BUSINESS, FINANCIAL, PRIVATE AND PERSONAL INTERESTS DECLARATION BY BOARD MEMBERS

This form should be used by all Board members of Rochdale Boroughwide Housing Limited to record their actual or potential conflicts of interest.

Full Name: _____

Address: _____

I hereby declare the following interests:

1.	Business/ Employment Name, address and nature of additional business or other employment interests.	
2.	Consultancy Name and address of company, firm or other body or individual on behalf of whom consultancy is undertaken by you and nature of the consultancy, with an indication of frequency/volume of such work.	

3.	<p>Directorships Nature, address and nature of business of each company or other body of which you are a director, with an indication of whether paid/unpaid/charitable involvement.</p>	
4.	<p>Partnerships Name, address and nature of business of each firm of which you are a partner.</p>	
5.	<p>Shareholders * Name, address and nature of business of each company in which you hold shares or debentures (excluding building society).</p>	
* Note:	(a) Only <u>beneficial</u> shareholdings need be declared (i.e. not shares held as a trustee).	
	(b) Shareholdings need only be declared if the total nominal value exceeds £1,000 or 1/100 of the total nominal value of the issued share capital of the company, whichever is the less.	
	(c) The amount of the holding need not be stated.	
	(d) Unit trust holdings need not be stated.	

6.	<p>Contract Description of any contract for goods, services, works made between you of a firm in which you are a partner, or a remunerated director, or hold shares as description in (5) above</p>	
7.	<p>Interests in land within the Borough ** Address or description of land or property in which you have a beneficial interest, or in which a firm in which you are a partner, or a remunerated director, or hold shares as description in (5) above has an interest, the nature of the interest and the use to which the land is put.</p>	
**	(a) Interests as a freeholder or leaseholder for a lease of 12 months or more should be declared.	
Note:	(b) Interests as an option holder or prospective purchaser should be declared.	
	(c) Interests by which you are directly concerned in seeking planning permission or some other consent or decision of the Council should be declared.	
	(d) You need not declare interests in land or property outside the Borough.	

7.	<p>Retainers Name and address of organisation to whom you are engaged on a retainer basis and the nature of the retainer.</p>	
8.	<p>Representative/Membership/Association List of organisations or public bodies of which you are an elected representative or you have membership/association, including trade unions, clubs and societies, e.g. Freemasons, etc.</p>	
9.	<p>Voluntary Bodies List of voluntary bodies of which you have membership or association.</p>	
10.	<p>Contributions List any person, other than a relevant organisation, who has made a payment to you in respect of election or any expenses incurred in carrying out your duties.</p>	

10.	Further information Please give any further information you wish about your business or financial interests.	
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Please continue on a separate sheet if necessary.

Is there any reason why this declaration should be regarded as confidential? If yes please give details.

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I declare that the above information is correct to the best of my knowledge and belief.

Signed:

Date:

When completed, please return the form to the Company Secretary.

CODE OF CONDUCT FOR BOARD MEMBERS

APPENDIX 4

ROCHDALE BOROUGHWISE HOUSING LIMITED

Board member Declaration of Interests Form

This form should be used by all **Board members** of Rochdale Boroughwise Housing to record actual or potential conflicts of interest. Details relating to this area are contained in the **Code of Conduct**.

A new form should be used for each individual declaration of interest.

Once completed the form should be forwarded to the Company Secretary for entry into the Register of Interests.

Board member's name:

- Is this declaration
1. Personal
 2. Relating to a family member
 3. Relating to a close friend or associate

Details of the Declaration:

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Is there any reason why this declaration should be regarded as confidential? If yes, please give details

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Signature.....

Date

CODE OF CONDUCT FOR BOARD MEMBERS

APPENDIX 5

ROCHDALE BOROUGHWIDE HOUSING LIMITED

Board members Gifts and Hospitality

This form should be used by all **Board members** to record any gifts or hospitality received or offered in accordance with the guidelines set out in the **Code of Conduct**. A separate form should be used for each declaration.

Once completed this form should be forwarded to the Company Secretary for entry into the Board members Gifts and Hospitality Register.

Complete as appropriate:

Name:.....

Name and address of company/individual offering gift/hospitality

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Type of gift/hospitality

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Offered / Accepted / Received

Reason for offering gift/hospitality

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Signed

Dated