**Corporate Hospitality and Gifts Policy**

1. **Introduction**

1.1 We expect all employees and those who work on our behalf to conduct themselves with integrity, impartiality and honesty at all times and to maintain high standards of propriety and professionalism. This includes avoiding laying themselves open to suspicion of dishonesty or putting themselves in a position of conflict between their official duty and private interest. Gifts and hospitality offered by and/or to our employees (or those working on our behalf) by and/or to participants, members, contractors, suppliers, stakeholders and others might place them in a vulnerable position. Even when offered and accepted in innocence, others may misconstrue the intention behind such gifts.

1.2 It is important to take particular care about any gift or hospitality from a person or organisation that has, or is hoping to have, a contract with us.

1.3 This policy is non-contractual, and sets out the way in which Goalball UK wishes to manage the giving and receiving of gifts and hospitality.

1.4 This policy applies to all employees, workers and any contractors working on our behalf. It applies even when giving a gift and no reimbursement from Goalball UK is sought or received.

1. **Legal considerations**

2.1 The following piece of legislation applies to this policy:

* the Bribery Act 2010.

1. **Definitions**

3.1 The term "business gifts" in this policy should be interpreted broadly and may include entertainment, accommodation, drinks and meals, vouchers, discounts, tickets to events, and the provision of services as well as gift items.

1. **Main principles**

4.1 The conduct of an individual should not create suspicion of any conflict of interest between official duty and private interest.

4.2 Individuals acting in an official capacity should not give the impression to any member, to any organisation with whom they deal or to their colleagues that they have been, may have been, or may in the future be, influenced by a business gift to show favour or disfavour to any person or organisation.

4.3 It is a disciplinary offence for employees to accept, or indicate that they may accept, any business gift as an inducement or reward that leads them, or may lead them, in an official capacity to take any action or not to take action; or to show favour or disfavour to anyone; or to fail to disclose that they have received business gifts and/or hospitality.

4.4 Any disciplinary action will be in accordance with our disciplinary procedure. If we regard the business gift to be of anything other than of modest value, the offence will be treated as gross misconduct.

1. **Accepting gifts**

5.1 Promotional or advertising items bearing the donor's logo and/or name (such as mouse pads, pens, diaries or umbrellas) may be accepted, as may coffee, tea, soft drinks and similar refreshments of modest value.

5.2 Individuals may accept modest gifts where refusal is likely to cause offence.

5.3 More substantial or expensive offerings must not be accepted. The recipient of an unsolicited gift of a more substantial nature, or of frequent gifts, must return them with a polite explanation that our rules do not allow their acceptance. If this is likely to cause offence, then it may be that the gift(s) can be accepted and donated to charity. In certain circumstances, where the gift is made as a token of the donor's gratitude for an exceptionally high standard of service, there may be a case made for acceptance of the gift by the individual on behalf of the organisation. In such cases, written permission must be sought from the Chief Executive.

**Legacies and bequests**

From time to time, members may decide that it is appropriate to leave a gift in the form of a legacy or bequest to an employee who has given particularly good service over a period of time.

On the death of a participant, small gifts of nominal value (i.e. less than £50) may be accepted from the family. If a larger gift is offered, or you are informed of a legacy or bequest, and to refuse it may cause offence, especially at a sensitive time, then it may be accepted provided that it is made clear to the donor that it will be declared to the Chief Executive and approval will have to be received from the Chief Executive or Chair of the Board. The details must then be declared immediately. In such cases, we reserve the right to require you to refuse the gift/legacy/bequest if we deem this to be inappropriate.

1. **Accepting hospitality**

6.1 Offers of hospitality may include invitations to social events such as sporting fixtures, concerts, theatrical performances or meals. Other invitations may include attendance at business conferences, presentations or recreational events for the purpose of general business discussions or information. Such offers may be accepted (including accommodation and/or transportation) provided that what is offered is reasonable under the circumstances, and that the offer meets one or more of the following criteria:

* the generation of good relations with a potential stakeholder (e.g. Board member, club member, other governing bodies for goalball, media, representatives of other sporting organisations, funders, sponsors, suppliers etc)
* the maintenance of good relations with a stakeholder
* the promotion of Goalball UK or the sport of goalball.

6.2 Any concerns about whether any hospitality offered may be accepted should be referred to the Chief Executive for consideration.

1. **Register of gifts and hospitality accepted**

7.1 In the interests of openness and integrity, and in order to protect individuals from accusations of impropriety, Goalball UK will maintain a central register of gifts and hospitality accepted.

1. **Offering gifts and/or hospitality**

8.1 It may be appropriate to offer gifts and/or hospitality when one or more of the following criteria is satisfied:

* the generation of good relations with a potential stakeholder (e.g. Board member, club member, other governing bodies for goalball, media, representatives of other sporting organisations, funders, sponsors, suppliers etc)
* the maintenance of good relations with a stakeholder
* the promotion of Goalball UK or the sport of goalball.

8.2 Prior to giving any gift or hospitality (other than modest value, e.g. refreshments or lunches), approval should be obtained from the Chief Executive.

8.3 Any gifts or hospitality given on behalf of Goalball UK must be modest in cost, quantity and frequency. Gifts of cash or cash equivalents, such as gift certificates, must not be offered.

8.4 Anyone who gives gifts or supplies hospitality which has not been approved in advance by the Chief Executive will not be reimbursed for the cost of the gift/hospitality and disciplinary action may be taken against employees who behave in this way. If the unauthorised gift or hospitality was paid for by Goalball UK, the employee (or the individual working on our behalf) may be required to refund this.

1. **Good practice**

9.1 When accepting or offering gifts or hospitality, employees must ensure that these:

* would not embarrass Goalball UK if disclosed publicly
* are not in poor taste or at a venue that would reflect poorly on Goalball UK (eg unsavoury or sexually oriented events, or events otherwise in violation of the our commitment to mutual respect)
* do not recur frequently enough to suggest an improper motive.

9.2 The following are strictly forbidden:

* giving or receiving money or other cash equivalent as a business gift
* giving or receiving gifts or hospitality that are too costly or frequent to be within the customs of the marketplace
* giving any gifts or hospitality to reward a government employee
* giving or receiving gifts or hospitality that influence or give the appearance of influencing business judgement
* offering a gift or hospitality when it is known that it would violate the recipient's policy to accept it

1. **Monitoring and review of this policy**

10.1 The Chief Executive has overall responsibility for implementing and monitoring this policy, which will be reviewed on a regular basis following its implementation (at least annually) and additionally whenever there are relevant changes in legislation or to our working practices.

10.2 Any queries or comments about this policy should be addressed to your manager.