



Policy #/Name: WCF Gifts and Hospitality Policy

Date of Board Approval: March 6, 2016

Policy Statement

WCF Board and Staff are aware that this is an area where perception is almost always more important than fact. WCF Board and Staff should seek to prevent receiving or giving gifts or hospitality if it might influence or be perceived to influence a business decision. The judgement made therefore needs to include an assessment as to whether the benefits gained by the Federation through the acceptance or giving of a gift or hospitality might be outweighed by adverse 3rd party criticism, even when that criticism is not reasonable, or be regarded as the acceptance of a bribe.

The intention of this Policy is to set out guidelines for WCF Board and Staff to follow to ensure that the Federation can demonstrate that no undue influence has been applied by or an external organization or anyone else dealing with the Federation.

Guidelines

1. The WCF Board and Staff shall not use their authority or office for personal gain and shall seek to uphold and enhance the standing of the Federation by maintaining an unimpeachable standard of honesty, impartiality and integrity in all their business relationships.
2. Each member of the WCF Board and Staff has a personal responsibility to ensure that an audit trail exists for all offers of gifts or hospitality, and should complete the form at below to notify the Secretary General of gifts and hospitality offered to WCF Board or Staff, whether the offer is accepted or not. This also includes any gifts given to other parties.
3. The Secretary General shall maintain a Register of Gifts and Hospitality, in accordance with the forms below, and shall make this available for inspection as required. Any questions or issues arising from the inspection shall be followed-up by the President and the Chair of the Governance Commission.
4. Any offer of a bribe or commission made to or by external organizations, or anyone else dealing with the Federation must be reported at once to the Secretary General or the President, following which, the WCF Board must be advised at the earliest possible opportunity. Where an offer is accepted, a proven breach of this Policy will lead to disciplinary action in relation to the Federation Board or Staff member concerned and may constitute gross misconduct.
5. This Policy is intended to complement the Code of Conduct, in particular with regard to gifts and hospitality, and should be read in conjunction with that Code.
6. Anyone from the WCF who becomes aware of a breach of this Policy must report this breach immediately to ensure prompt and appropriate action can be taken against any WCF Board or Staff or third parties, if necessary. There are also occasions within the Policy where prior approval is required. In those cases, please follow your reporting hierarchy.
7. WCF Directors must not accept any benefit from a third party which he or she receives because they are a Director of the Federation except where the benefit cannot be reasonably regarded as likely to give rise to a conflict of interest.

Gifts (giving/receiving)

1. Gifts (defined as items given without the expectation of receiving anything in return) should not be accepted where they may appear to be disproportionately generous or could reasonably be construed as an inducement to affect a business decision.
2. Any gifts offered (whether accepted or not) which are not of a trivial nature, should be notified to the Secretary General using the form below. A gift will be considered trivial if by virtue of its nature or branding it has no material commercial value, that is to say, no unrelated third party would reasonably be expected to purchase the item for a sum in excess of USD \$200. Examples of trivial gifts are pins, corporate or organization branded clothing or event-related material.
3. Any gifts falling outside the definition of trivial should not be accepted by an individual, however there may be occasions when to refuse a gift may cause offence. Where failing to accept a gift could cause offence you should make clear you are accepting it on behalf of the Federation and then surrendered to the Secretary General. These surrendered gifts may be kept for display in the WCF office or re-purposed at the discretion of the WCF Board for the benefit of the Federation.
4. Any WCF Board Member or Staff member who has received two gifts from any external organization within a single financial year should not accept any further gifts during that financial year from the same organization.

Hospitality (giving/receiving)

1. Invitations to lunch or dinner from an external organization should only be accepted where the primary reason for accepting an invitation is to discuss business matters either with representatives of the hosting organization or with representatives of other organizations that may have business interests or activities in common with the Federation and where the venue and hospitality are not in themselves an inducement to accept the invitation or the purpose of the invitation. A good measure of whether it is appropriate to accept such an invitation is to consider if the WCF might reciprocate at some point.
2. It is recognized that participation in certain events such as conferences, events, seminars and trade shows can be of particular value where they support the establishment of relationships with strategic suppliers or enhance the Federation's knowledge or understanding of a particular area. For such events, the hospitality element should be incidental to the event and relevant business information is expected to be gained through attendance.
3. Hospitality that includes travel or overnight accommodation may be accepted when it is linked to the function you are performing. No additional nights will be accepted. The reason for acceptance should always be recorded in advance using the forms below.
4. Where an invitation has been received for multiple or group attendance, prior consent must be sought.
5. Repeated invitations are deemed to be inappropriate, and anyone of the Federation who has accepted hospitality of a social kind from an external organization should not accept any further invitations of a similar type from the same organization within the following twelve months.
6. In all cases any offer of hospitality should only be accepted with prior approval. The reason for acceptance should always be recorded in advance using the forms below.
7. Declined offers of hospitality should also be recorded on the form below.
8. In cases of doubt about issues relating to the acceptance of hospitality, the matter should be discussed with line management, Secretary General, the WCF President or WCF Board, as appropriate.
9. Where a possible issue relating to this Policy arises, the advice of the WCF President or Secretary General or WCF Board should be sought.

Hospitality/Gift Received/Given Register Form

Name : _____

Event : _____

Location : _____

Gift Description	Value – Over US\$200

Signed : _____

Date : _____

All gifts or hospitality received worth more than an estimated US\$200 should be reported using this form. In addition this form may be used to report any gifts or hospitality under that value which the recipient feels should be reported for whatever reason even although the value is estimated to be under the US\$200 threshold.

Completed forms to be returned to the Secretary General (colin.grahamslaw@worldcurling.org) to be added to the gift register. Forms should be returned as soon as possible following the event.