

# **Hospitality, Gifts, & Donations Policy**

## DOCUMENT MANAGEMENT

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This policy shall be reviewed and updated as required every three years		
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V001	Mar 17	N/A – Document Creation
V002	Apr 17	Minor amendments following EMT feedback
V003	Apr 17	Governance Subcommittee Review
VO04	May 17	Approved by Board

If you have any questions or require clarification on any items within this policy please contact your CEO, Director or your Human Resource Manager.

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## 1) Introduction

This policy details Special Olympics Ireland (SOI)'s policy regarding gifts, hospitality, entertainment & donations and sets out the standards of behaviour to which all employees must adhere to.

A Board Member, employee of SOI or Regional Committee Member must not directly or indirectly; ask for, offer or accept money, gifts, hospitality or anything else that could influence or reasonably give the appearance of influencing the relationship with that organisation or individual.

Gifts and hospitality must be modest, reasonable and infrequent so far as any individual recipient is concerned. Accepting gifts, invitations, money, hospitality or any other benefit may create an appearance of impropriety or may raise a potential conflict of interest – please refer to the Conflict of Interest & Loyalty Policy.

Gifts, hospitality or donations must never be promised, offered, or provided with the intent of causing the recipient to do something favouring SOI or to prevent any wrongdoing towards the organisation.

## 2) Statement of Intent

The intention of this policy is to set out rules and guidance for all Board Members, employees of SOI or Regional Committee Members to follow regarding the acceptance or offering of gifts, hospitality or political donations. This policy is designed to ensure that SOI can show that no unnecessary influence has been carried out by any external party or individual dealing with SOI.

## 3) Definitions

### a) Gift

The term “gift” includes any benefit which is given to a stakeholder free of charge or at less than its commercial price. In the case of gifts, these should never be cash and must be modest at all times ensuring there is no risk of them being misinterpreted as a reward, an incentive or other corrupt act.

### b) Hospitality

Hospitality shall be understood to mean an offer of food, drink, accommodation and/or entertainment.

## 4) Scope

The policy applies to Board Members, employees of SOI (including those on permanent or fixed term contracts and work placement) or Regional Committee Members, volunteers, consultants and contractors.

## 5) Receiving of Gifts, Hospitality & Entertainment

It is the policy of SOI:

- To assure that the offer / gift is appropriate in all the circumstances and there is no risk or perception that they might improperly influence the recipient.
- To ensure that the offer is not related to an actual or anticipated business action with the recipient, particularly in a procurement scenario.
- Unsolicited gifts of very small intrinsic value (e.g. diary, calendar, bottle of wine/spirits etc.) can be accepted for personal use up to a value of €50. Unsolicited gifts above this value can be accepted on behalf of the organisation; and should then be given to the relevant director/CEO for fundraising purposes or for equitable distribution.
- Cash, cheques or any gift vouchers that may be exchanged for cash may not be accepted regardless of the amount unless it is receipted as a donation to the organisation.
- As a guide meals, refreshments, entertainment, accommodation or travel of reasonable value, should only be accepted on the basis that the expense would be deemed an appropriate business expense if it were to be charged back to SOI.
- All offers of hospitality from commercial interests which have or might have contractual relations with the organisation must be reported by all employees to their relevant Director / CEO /

Chairman of the Board for direction. Any offers which have been deemed unacceptable should be returned to the sender, with a note advising that acceptance would be contrary to SOI's policy.

## **6) Giving of Gifts, Hospitality & Entertainment**

SOI will not object to the offering / giving of gifts (such as SOI branded materials / advertising novelties) or routine hospitality e.g. business lunch. Such items must be within the confines of your budget with approval sought for each item of expenditure. The number of Board Members, employees of SOI or Regional Committee Members availing of the hospitality must be kept to a minimum and should primarily be for the purpose of relationship management and networking.

## **7) Recording of Gifts, Hospitality & Entertainment**

A register of gifts, hospitality and entertainment offered or received will be maintained by each Director and submitted to the Financial Director on an annual basis.

This register will be available for inspection as required and will be reviewed by the Audit and Finance Subcommittee. Any questions or issues arising from the inspection shall be followed-up with the Finance Director and CEO.

## **8) Donations**

SOI is a politically neutral organisation and does not make donations to any political parties, organisations, or individuals engaged in politics. All Board Members, employees of SOI or Regional Committee Members will hold their own personal political views and activities but are not permitted to use the organisation's name or assets to promote their views.

Board Members, employees of SOI or Regional Committee Members will receive no personal benefit (individually or collectively) from donations offered to SOI. Where a personal benefit is tied to a donation, the donation, benefit, or both will be declined.

Donations will be accepted once they are given in good faith and serve the best interests of the organisation. SOI may refuse a donation if the actions of the donor do not support the vision, goals and objectives of the organisation; or whereby the cost to the charity will be greater than the value of the donation e.g. reputational damage. Donations will also be refused if the donation is dependent on conditions which are deemed unreasonable by the organisation. For details regarding donations and fundraising please refer to our Fundraising Activities Policy.

## **9) Non-compliance**

Any breach of this policy by Board Members, employees of SOI or Regional Committee Members will be treated in accordance with statutory obligations, the relevant contract and where appropriate SOI's Disciplinary Policy.

## **10) Document Retention**

Records will be retained or destroyed in line with the company's document management procedures.