



Hospitality and Gifts Policy

Name of Author	<i>Chief Executive Officer</i>
Approved by	<i>The Board of Directors</i>
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Policy Applies to: all persons involved with the business operations, national teams and decisions of the Company involving key volunteers.

Policy Statement

It is Hockey Wales' (Hockey Wales) policy that

“Individuals must not, either directly or indirectly, accept any gift, reward or benefit from any sponsor or potential sponsor, Hockey Wales registered member, member of the public or organisation with whom they have been brought into contact with by reason of their Hockey Wales duties.”

Hockey Wales is committed to maintaining the highest standards of corporate governance and conducts its business in an open and transparent manner. The aim of this policy and process is to protect both Hockey Wales and the individuals concerned from any appearance of improper behaviour. Everyone identified within this policy documentation should conduct themselves with integrity, impartiality and honesty at all times and should maintain high standards of propriety and professionalism.

Scope

This Policy applies to all of the following Hockey Wales personnel:

- directors and sub committees of the Board;
- regional chairs and regional committee members;
- members of committees, working groups, task forces or similar appointed by Hockey Wales for any purpose;
- volunteer national coaches and team management;
- full time, part time and casual employees;

Individuals should avoid situations where they, or Hockey Wales, could be open to suspicion of dishonesty. Individuals should, therefore, always have in mind the need not to give the impression to any of their colleagues, or organisations with whom they deal, Hockey Wales members, or the public, that they may be influenced, or have, in fact, been influenced by any gift or consideration, to show favour or disfavour to a person or organisation whilst acting in an official Hockey Wales capacity.

The only exceptions to this rule are as follows:

- isolated gifts of a trivial character or inexpensive seasonal gifts (such as calendars and diaries);
- conventional hospitality provided it is normal and reasonable in the circumstances;
- gifts provided by hosting countries to all teams and/or delegates when attending an event

In considering what is normal and reasonable, regard should be given to:

- the degree of personal involvement. There is, of course, no objection to the acceptance of, for example, an invitation to the annual dinner of a large organisation or similar body with which Hockey Wales is in day to day contact, or of working lunches (provided the frequency is reasonable) in the course of normal business;
- the usual conventions of returning hospitality. The isolated acceptance of, for example, a meal, would not offend the rule, whereas the acceptance of frequent or regular invitations to lunch or dinner on a wholly one-sided basis, even on a small scale, might give rise to a breach of the standard of conduct required.

If there is some doubt raised, or the individual has any doubt about the propriety of accepting any gifts, benefit or hospitality, the Chief Executive Officer (CEO), whose decision shall be final, must be consulted. In the case of the CEO requiring any clarification, then the Chair of the Board will be make the final decision.

It must be noted that, any money, gift or consideration received by an individual from a person or organisation holding, or seeking to obtain, a contract with Hockey Wales including any purchase contracts, will be deemed to have been received corruptly unless proved to the contrary. It is, therefore, essential to declare any gifts or considerations received to the CEO* and to obtain written approval for the retention of the gift. Such approval is to be recorded in the Hospitality and Gifts Register which shall be set up and maintained by the CEO (or to a delegated individual). Information shall be retained for at least 10 years in line with other Hockey Wales requirements.

Other Hockey Wales policies may impact on this policy area and may need to be consulted when determining the appropriateness of accepting a gift or hospitality, particularly the Conflicts of Interest Policy and Codes of Conduct. Implementation of this policy and procedure must be clear and transparent and not subject to any unfair discriminatory practices.

Awards and Prizes

If an individual is approached by an outside organisation about the offer of an award or prize in any way connected with their official Hockey Wales duty, the CEO* must be consulted.

Retention of the award or prize will normally be allowed, having regard to considerations of proprietary and the risk of criticism, provided the award is:

- offered in recognition of personal achievement, and
- not in the nature of what could be construed as a gift, an inducement, or payment for a publication, or invention to which other rules may apply.

The CEO's approval for the retention of the award or prize must be in writing and details recorded in the Hospitality and Gifts Register.

UK Bribery Act Awareness

Individuals must be aware of, and comply with, the requirements of the UK Bribery Act 2010, which has two general offences:-

- the offering, promising or giving of an advantage, and
- the requesting, agreeing to receive or accepting of an advantage

It is an offence under the Bribery Act for a person to corruptly accept any gift or consideration as an inducement or reward for doing, or refraining from doing, anything in their official capacity, or showing favour or disfavour to any person in their official capacity.

Offering Hospitality – Outside of a HOCKEY WALES Planned Activity

It is not possible to anticipate every situation when hospitality might be given and the following gives only a broad indication of the types of circumstances that may arise. Whether a specific case falls within these circumstances is a matter of judgement by the individual who must be prepared to justify their decision if it is subsequently challenged.

The question of hospitality (other than for light refreshments such as tea and coffee) often arises when the meeting/event/visit occurs adjacent to a meal time. However, it does not follow that every meeting with every visitor to Hockey Wales occurring at this time requires the offer of hospitality. This depends upon the status of the visitor and the circumstances at the time.

As far as officers of Sport Wales, local authorities and other agencies are concerned with whom routine business is being discussed, it will not, generally, be appropriate to offer hospitality except in exceptional circumstances and with the prior approval of the CEO.

Hockey Wales policy is that:

"All formal and informal entertaining of business contacts, other than for light refreshments, must be approved by the CEO before taking place."

Employees, Directors and others will be able to reclaim the costs of purchasing drinks and / or a meal, e.g. a working meal with a Welsh Government, Sport Wales Official or FIH representative. Costs should be kept within the daily subsistence rates in line with the Hockey Wales expenses policy.

Claims for entertaining in the following circumstances will not be accepted:

- Entertaining personal friends
- Entertaining Hockey Wales colleagues
- Reciprocal entertaining of business acquaintances (even where business is discussed)
- Entertaining occasions where no customer, supplier or business connection is present

*** Note: If the CEO is the individual concerned, the CEO must consult the Chair.**

Further Information

For further information about any aspect of Hockey Wales Hospitality & Gifts Policy, please contact:

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