

Hospitality and Gifts Policy and Procedures

Individuals must avoid situations where they, or BowlsWales, could be open to suspicion of dishonesty, for that reason conflict of interest as well as hospitality and gifts need careful consideration. Individuals should always have in mind the need not to give the impression to any of their colleagues, or organisations with whom they deal, BowlsWales members or the public, that they may be influenced or have been influenced by any gift or consideration to show favour or disfavour to a person or organisation whilst acting in an official BowlsWales capacity. To ensure this is the case BowlsWales has agreed a policy and process to be followed. The policy statement needs to be clear so that everyone fully understands it.

Policy

It is BowlsWales policy that

“Individuals must not, either directly or indirectly, accept any gift, reward or benefit from any organisation or individual with whom they have been brought into contact with by reason of their BowlsWales duties.” [Examples include but are not limited to, sponsors or a potential sponsor, BowlsWales members, members of the public or any other organisation.]

BowlsWales 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 BowlsWales and the individuals concerned from any actual, or 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 BowlsWales personnel:

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

The only gift and hospitality 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 that it is normal and reasonable in the circumstances;
- gifts provided by hosting countries to all teams and/or delegates when attending an event or similar

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 BowlsWales 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.
- The gift or hospitality be deemed to be of benefit to BowlsWales.

If there is some doubt raised, or the individual has any doubt about the propriety of accepting any gift, benefit or hospitality, the General Manager, must be consulted, whose decision shall be final.

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 BowlsWales 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 General Manager* and to obtain written approval for the retention of the gift. Such approval is to be recorded in the Gifts, Rewards and Hospitality Register which shall be set up and maintained by the General Manager. Information shall be retained for at least 10 years/set timeframe in line with other BowlsWales requirements.

N.B. Other BowlsWales 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 BowlsWales duty, the General Manager* must be consulted.

Retention of the award or prize will normally be allowed, having regard to considerations of propriety 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 General Manager's approval for the retention of the award or prize must be in writing and details recorded in the Gifts Awards and Hospitality 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 BowlsWales 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 BowlsWales 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 General Manager.

BowlsWales' policy is that:

“All formal and informal entertaining of business contacts, other than for light refreshments, must be approved by the General Manager* before taking place.”

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

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

- Entertaining personal friends
- Entertaining BowlsWales 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 General Manager is the individual concerned, the General Manager must consult the Chair.

Finance	
Legal	
Risk	