



WCF Gifts and Hospitality Policy

Policy Statement

The WCF recognises that MAs, service providers and other stakeholders might, from time to time, offer gifts and other benefits to members of the WCF. This policy provides the detail about the giving and accepting of gifts and details the procedures and responsibilities that need to be followed.

The intention of this Policy is to set out guidelines to ensure that the Federation can demonstrate that no undue influence has been applied by an external organisation or anyone else dealing with the Federation.

1. Application

1.1 This policy is applicable to the following individuals:

- a) Any person serving as a member of a WCF governing body, including, but without limitation to, the WCF President, the WCF Secretary General, WCF Board members and any candidates who are up for election to the WCF Board
- b) Any person serving on any WCF Commission, Working Party or in any similar role
- c) Any person employed (whether full time, part time, permanently, on a fixed-term or temporary contract) or engaged as an agent, consultant, or contractor
- d) Any person appointed or assigned by the WCF to work / volunteer at a WCF event, including, but without limitation to, on-ice officials, off-ice officials, coaches, timers, medical personnel, technical officials, and any other individual who receives WCF accreditation

2. Responsibilities

2.1 Any of the above-mentioned individuals may give and accept reasonable and proportionate gifts of nominal value, in accordance with local customs, as a mark of respect or friendship

2.2 To assess whether it is reasonable and proportionate to accept a gift, considering cultural norms, the relevant individual must determine whether the offered or accepted gift:

- a) has a symbolic or low monetary value
- b) is likely to help the overall effectiveness of the WCF
- c) places any obligation or perceived obligation on them
- d) is not frequent or lavish (considering cultural norms)
- e) does not create any conflict of interest
- f) conflicts with their duties
- g) can be justified as meeting all the above requirements
- h) provides benefits to the WCF that outweigh the risk of possible misperception of the hospitality

2.3 No WCF official can accept or give a gift of cash

3. Governance / Reporting procedure

- 3.1 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
- 3.2 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 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
- 3.3 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
- 3.4 Any offer of a bribe or commission made to, or by, external organisations, or anyone else dealing with the Federation, must be immediately reported 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 Board or Staff member concerned and may constitute gross misconduct
- 3.5 This policy is intended to complement the WCF Code of Conduct, in terms of gifts and hospitality, and should be read in conjunction with that Code
- 3.6 Anyone from the WCF who becomes aware of a breach of this policy must report it immediately to ensure prompt and appropriate action can be taken
- 3.7 Directors of the WCF must not accept any benefit from a third party except where the benefit cannot be reasonably regarded as likely giving 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 a bribe
2. Any gifts offered (whether accepted or not) which are not of a trivial nature, should be notified to the Secretary General by using the form below. A gift will be considered trivial if, by virtue of its nature or branding, it has no material commercial value, e.g., no unrelated third party could reasonably be expected to purchase the item for a sum more than USD \$200. Examples of trivial gifts are pins, corporate or organisation 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 refusing a gift may cause offence. Where failing to accept a gift could cause offence, it should be made clear the gift is being accepted 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 organisation within a single financial year should not accept any further gifts, during that financial year, from the same organisation

Hospitality (giving/receiving)

1. Invitations to lunch or dinner from an external organisation should only be accepted if the primary reason for accepting is to discuss business matters. This may be with either representatives of the hosting organisation or with representatives of other organisations that may have business interests or activities in common with the Federation. An invitation may also be accepted if the venue and hospitality are not, in themselves, an inducement to accept 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, seminars and trade shows can be of 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. For these events, should an invitation to a major sporting or cultural event be included, reference should be made to the section below on invitations of a social nature.
3. Invitations of a social nature (e.g., sporting, and cultural events) should be declined except where the interests of the Federation can be clearly demonstrated in advance and the business justification is both compelling and by exception.
4. Hospitality, that includes travel or overnight accommodation, may be accepted when it is linked to the function that an individual is undertaking. No additional nights' accommodation will be permitted. The reason for acceptance should always be recorded in advance using the form in Appendix A.
5. Where an invitation has been received for multiple or group attendance, prior consent must be sought from the WCF Secretary General.
6. Repeated invitations are deemed to be inappropriate, and anyone from the WCF who has accepted hospitality of a social kind from an external organisation should not accept any further invitations of a similar type from the same organisation within the following twelve months.
7. In all cases, any offer of hospitality, should only be accepted with prior approval from the Secretary General. The reason for acceptance should always be recorded, in advance, using the forms in Appendix A.
8. Declined offers of hospitality should also be recorded in Appendix A.
9. In cases of doubt about issues relating to the acceptance of hospitality, the matter should be discussed with the Secretary General, the WCF President or WCF Board, as appropriate.
10. 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 which is 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 even though the value is estimated to be under the US\$200 threshold.

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