



Gifts and Entertainment Policy

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Approval

Policy owner	Executive Director, Corporate Services		
Approved by	Executive Leadership Team State Council		
Date approved	ELT: 13.11.2019 State Council: 04.12.2019	Review date	04.12.2021

Purpose

1. The Society of St Vincent de Paul (NSW) and its related company, the St Vincent de Paul Society NSW (together the Society) are committed to ensuring there is an ethical basis for and transparency in relation to gifts and entertainment offered to or accepted by Society Personnel.
2. This policy provides guidance to Society Personnel in relation to decision-making regarding whether:
 - the Society may provide gifts and entertainment to Society Personnel
 - the Society may provide gifts and entertainment to external stakeholders
 - Society Personnel may accept gifts and entertainment from external stakeholders.
3. This Policy aims to ensure that:
 - decisions about gifts and entertainment are made consistently and transparently across the Society
 - decisions about gifts and entertainment are not improperly influenced
 - Society funds are not imprudently or improperly used.

Scope

4. This Policy applies to the provision of gifts and entertainment:
 - by the Society to Society Personnel
 - by the Society to external stakeholders
 - by external stakeholders to Society Personnel.
5. This policy applies to all Society Personnel (Board Directors, Society members, staff and volunteers).
6. This policy does not apply to expenses incurred by Society Personnel undertaking business related travel; these are dealt with in the Society's Travel Policy.

Related policies and procedures

7. Related policies and procedures include:
 - Code of Conduct for Members, Volunteers and Employees
 - Travel Policy
 - Managing Fraud and Dishonesty Policy
 - Conflict of Interest Policy
 - Whistleblowing Policy

- Delegations of Financial Authority

Policy principles

8. The Society is committed to the principle of hospitality. We are a hospitable and welcoming organisation that will on occasion:
 - provide refreshment and entertainment to both Society Personnel and to external stakeholders
 - recognise the contributions of both Society Personnel and external stakeholders by the provision of modest gifts.
9. The Society also recognises that we are an organisation that serves people experiencing poverty and disadvantage. Our work is supported by generous donations from the public as well as through government grants. We have a responsibility to ensure the proper use of our financial resources.
10. We are also committed to ensuring there is an ethical basis for and transparency in relation to gifts and entertainment offered to or accepted by Society Personnel.

Provision of gifts to Society Personnel

11. There are limited occasions when it is reasonable for The Society to provide gifts to Society Personnel, including:
 - when a long-serving staff member or volunteer leaves the Society (at least five years' service)
 - when a long serving member completes their service
 - flowers to mark the birth or adoption of a child
 - flowers to offer condolence or in circumstances of hospitalisation or serious illness.
12. Such gifts should be modest, and generally of no more than approximately \$100 in value (or \$20 per year of service).
13. Only the State Council President, Vice Presidents, Central Council Presidents, Regional Presidents, the Chief Executive Officer, Executive Directors, Chief Financial Officer, Directors or Managers may approve the provision of gifts to Society Personnel.
14. The State Council President or Chief Executive Officer may approve gifts of greater value if circumstances warrant.

Provision of gifts to external stakeholders

15. There are occasions when it is reasonable for the Society to provide gifts to external stakeholders, including:
 - to donors
 - to guest speakers at events.
16. Such gifts should be modest, and generally of no more than approximately \$100 in value.

17. Only the State Council President, Vice Presidents, Central Council Presidents, Regional Presidents, the Chief Executive Officer, Executive Directors, Chief Financial Officer, Directors or Managers may approve the provision of gifts to external stakeholders.
18. The State Council President or Chief Executive Officer may approve gifts of greater value if circumstances warrant.

Provision of entertainment to Society Personnel

Meals and entertainment

19. There are occasions when it is reasonable for the Society to provide entertainment or hospitality to Society Personnel, including:
 - Board dinners which are routinely held at the completion of a Board meeting
 - State Council dinners which are held once or twice per year
 - a partial contribution to an end of year celebration (up to a threshold of approximately \$30 per person)
 - appreciation events for members and volunteers
 - occasional morning or afternoon tea events to mark significant events, milestones or achievements.
20. Entertainment should be modest and appropriate for the event for which it is provided.
21. In limited circumstances (for example at a Board or State Council dinner), alcohol may be provided when consumed with food or as part of other necessary business entertainment where the alcohol component is not the primary expenditure submitted for reimbursement (that is, greater than the total food expense). In all cases, alcohol must be consumed responsibly. Only the Chief Executive Officer, Executive Director or Chief Financial Officer may approve the provision of alcohol as a part of business entertainment.
22. The State Council President, Vice Presidents, Central Council Presidents, Regional Council Presidents, Conference Presidents, the Chief Executive Officer, Chief Financial Officer or the relevant Executive Director, Director or Manager may approve appreciation events for members and volunteers.
23. Only the State Council President, Vice Presidents, Central Council Presidents, the Chief Executive Officer, Executive Director or Chief Financial Officer may approve meals and entertainment provided to Society Personnel in external premises, such as restaurants.
24. In general, it is not appropriate for Society funds to be expended for events held at external premises, such as team Christmas lunches, birthday celebrations, farewell functions or anniversary dinners. Such events should be personally funded by participating Society Personnel.
25. The State Council President or the Chief Executive Officer may approve entertainment beyond that set out above if circumstances warrant.

Catering for business activities

26. Catering, including morning and afternoon tea, and lunch, may be provided in conjunction with legitimate business activities, such as meetings, workshops or training that are held over meal times:

- catering costs should be modest, and appropriate for the event for which catering is provided
- where possible, catering should be provided through the Matthew Talbot Hostel catering service
- organisers of meetings should take appropriate steps to ensure that where possible meetings are not held over meal times
- alcohol is not to be provided as a part of catering for business activities.

27. Only the State Council President, Vice Presidents, Central Council Presidents, Regional Council Presidents, the Chief Executive Officer or the relevant Executive Director, Chief financial Officer, Director or Manager may approve catering provided in conjunction with business activities.

Provision of entertainment to external stakeholders

28. There are occasions when it is reasonable for the Society to provide entertainment or hospitality to external stakeholders, including:

- donor events
- guest speakers at events
- as hospitality for personnel from external agencies visiting the Society.

29. Entertainment should be modest and appropriate for the event for which it is provided.

30. In limited circumstances (such as when entertaining external stakeholders at an evening meal), alcohol may be provided when consumed with food or as part of other necessary business entertainment where the alcohol component is not the primary expenditure submitted for reimbursement (that is, greater than the total food expense). In all cases, alcohol must be consumed responsibly. Only the Chief Executive Officer, Chief Financial Officer or the relevant Executive Director or Director may approve the provision of alcohol to external stakeholders as a part of business entertainment.

31. Only the State Council President, Vice Presidents, Central Council Presidents, the Chief Executive Officer, Chief Financial Officer or the relevant Executive Director or Director may approve the provision of entertainment to external stakeholders.

32. The State Council President or Chief Executive Officer may approve entertainment beyond that set out above if circumstances warrant.

Receipt of gifts or entertainment from external stakeholders

33. Society Personnel may accept reasonable and modest gifts or entertainment of the kind given in the normal course of business where there is a legitimate business or cultural reason. Ordinarily, such gifts should be shared amongst the relevant group of staff.

34. Society Personnel must not individually accept gifts from an external stakeholder that are of more than \$100 in value. Either politely decline the gift or treat it as a donation. Seek advice from your manager as to how to direct the donation.

35. Society Personnel must report any gift from an external stakeholder greater than \$100 in value, by email to company.secretary@vinnies.org.au for recording in the Gifts Register.

36. If a Society Personnel is offered gifts or entertainment by a supplier or prospective supplier, the Society Personnel must:

- advise their immediate Manager
- act in accordance with the Code of Conduct and the Gifts and Entertainment Policy
- only accept gifts of nominal value
- not accept gifts or entertainment where it could be perceived as having influence over the Society's procurement decision.

37. Society Personnel must not seek gifts or entertainment from external stakeholders.

38. Society Personnel should not accept a gift or entertainment if:

- it is offered to secure a material benefit for the party offering it
- the gift or entertainment is from a supplier trying to win or maintain business with SVDP NSW
- to do so would compromise the Society's reputation or impartiality
- to do so may lead to an actual, potential or perceived conflict of interest, or
- the gift is cash or easily converted to cash.

39. Society Personnel must not seek or accept a bribe or other improper inducement.

Roles and responsibilities

40. All Society Personnel must comply with this policy. Any breach of this policy will be managed through normal management channels.

41. Managers and supervisors must ensure that appropriate approvals are sought for any gifts or entertainment provided by the Society. Within the approvals set out in this policy, the individual responsible for the budget from which expenditure will be drawn may approve gifts or entertainment in line with this policy.

42. The Executive Director, Corporate Services is responsible for the implementation and oversight of this policy.

Review

43. This policy is scheduled for review at least every two years from the date of its endorsement.

44. The effectiveness of the operation of this policy will be evaluated and reviewed by the Executive Director, Corporate Services.

Further assistance

45. The Executive Director, Corporate Services is able to provide advice about the content and implementation of the policy.

Approval and amendment history

Version	Approval authority	Date	Amendment summary
Doc #			NA

Appendix 1: Definitions

1. Relevant definitions include:

Term in Bold	Definition
Society Personnel	Any person (or group of people) engaged by the Society to assist in its works. This includes members, volunteers, employees, contractors and consultants.
Donor	A party that donates money or goods to the Society
Supplier	A party that sells goods or services to the Society.