




Gifts and Donations Policy

STATEMENT

The Paraplegic & Quadriplegic Association of South Australia Ltd (PQSA) is committed to high standards of ethical conduct and recognises the importance of transparent behaviour and records relating to gifts and donations that PQSA receives.

Approved by:  Chief Executive Officer	Date: May 2022
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In this policy, 'us' 'we' or 'our' refers to The Paraplegic & Quadriplegic Association of South Australia Ltd ACN 644 670 977, which is a Company Limited by Guarantee and conducts its business through Lifestyle Support and HomeCare+ services.

Please note that printed copies are not able to be controlled and the Shared Drive should always be referred to for the most current version.

SCOPE

Compliance with this policy is a condition of appointment for all workers engaged to provide services on behalf of PQSA.

DEFINITIONS

Refer to the PQSA Policy and Procedure Definition Glossary

RESPONSIBILITIES

It is our responsibility to communicate our policies and procedures to all workers on a systematic basis. Individual Directors and Supervisors are responsible for monitoring workers' understanding of their obligations and need for compliance with policies and procedures. Workers are responsible for complying with our policies and procedures.

POLICY

This policy is designed to ensure all workers are aware of their responsibilities in regard to the acceptance and allocation of gifts and donations to PQSA. This includes gifts and donations to the worker directly as a result of their work with PQSA. We are committed to high standards of ethical conduct and ensuring that our donors' wishes are respected.

We recognise the potential for a conflict of interest arising for its workers following the receipt of gifts or donations. We provide clear boundaries as to when gifts may and may not be accepted. Furthermore, we have strategies that effectively minimise the likelihood of a conflict of interest occurring regarding the acceptance of gifts.

Gifts

Workers are not to accept any gifts or benefits from a client, supplier or business, which are as a direct result of their work with PQSA, and which could be perceived to influence the worker and their decision making in any way. Gifts and donations must not be accepted by suppliers or contractors who are in the process of tendering for PQSA business.

The only circumstances when it is appropriate to accept such a gift (notwithstanding the previous statement) are if refusal of the gift would cause serious offence to a supplier or business or diminish the relationship in some way, or if the gift is commensurate with the relationship with the supplier or business.

Workers are only permitted to accept token gifts with minimal or no value from clients. Under no circumstances are workers to accept or seek any financial payment, financial support, the equivalent of financial payments and support (e.g. services rendered in lieu) or borrow money from clients or a client's family.

Workers should not accept any gift where there is or may be a perception of a conflict of interest with past, present or future duties, or where the object of the gift is to maintain or return a favour.

Gifts from Clients

Workers must make clients aware that they are not allowed to accept gifts. If a client insists or if the worker feels obliged to receive the gift, appropriate steps per the Gifts and Donations Procedure need to be followed.

Gifts from Suppliers

All gifts and donations from commercial suppliers and contractors are deemed to be the property of PQSA. If a worker receives a gift from a supplier, appropriate steps per the Gifts and Donations Procedure need to be followed.

Donations

PQSA is registered as a Deductible Gift Recipient (DGR) as per the Australian Taxation Office (ATO) regulations which means donations to PQSA are an allowable deduction for tax purposes.

Donors can make a monetary donation to PQSA in a manner of their choosing or via platforms established by PQSA.

Register of Notifiable Gifts

A Register of Notifiable Gifts and Donations will be kept by the Finance Director or nominee for all gifts with a monetary value of \$150.00 or more received by PQSA including those given directly to a worker.

The Register of Notifiable Gifts and Donations will be available to auditors when requested.

Reporting breaches of the Gifts and Donations Policy

If a person suspects that a Gift or Donation has not been disclosed or has been incorrectly disclosed in accordance with this policy, they must immediately report it to their Director/Manager or the Director of People and Culture.

Discrimination

Any worker or donor who believes that they are disadvantaged or discriminated against by the incorrect application of this policy may raise a dispute in accordance with the PQSA Workers Grievance and Complaints Management Policy and Procedure.

RELATED LEGISLATION

- Collections for Charitable Purposes Act 1939
- Funding Institute of Australia (FIA) Principles and Standards of Fundraising Practice
- Privacy Act 1988
- Trade Practices Act 1974

SUPPORTING PQSA DOCUMENTATION

- Code of Conduct and Ethical Behaviour
- Complaint - Concern (Worker) Management Policy and Procedures
- Conflict of Interest Governance Policy and Procedures
- Gift and Donations Procedure

BREACHES OF THIS POLICY

A **breach** of this policy is grounds for disciplinary action, up to and including termination of employment. Ignorance of these procedures will not generally be accepted as an excuse for non-compliance. Only in extreme circumstances and where such ignorance can be demonstrated to have occurred through no fault of the individual concerned will PQSA accept such an argument.

DISTRIBUTION AND REVIEW

PQSA will ensure all persons engaged to provide services either paid or unpaid will be aware of this policy and will have easy access to it in an appropriate format. All policies are to be reviewed on a periodic basis or when legislation or government policy determines.