



# Corporate Sponsorship Policy

Media, Marketing & Communications  
**Office of the Commissioner**

Policy no CS04-01  
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## 1 Purpose

The policy aims to ensure community trust and confidence in Fire and Rescue NSW (FRNSW) is maintained when in receipt of corporate sponsorships by providing guidance in sponsorship management.

To ensure accountability and transparency within the public sector, sponsorships will be carefully scrutinised by FRNSW to ensure they fit within the governing ethical framework and are in the public interest.

This policy is underpinned by the Corporate Sponsorship Procedures that stipulates the requirements for engaging in such arrangements.

## 2 Scope and application

This policy applies to all Fire and Rescue NSW Employees, contractors and consultants engaged by, or on behalf of, Fire and Rescue NSW.

## 3 Legal and policy framework

### 3.1 Legal framework

The following legislative and corporate policies underpin the Sponsorship, Donations and Fundraising Policy.

- *Fire and Rescue NSW Act 1989 No 192*
- *Government Sector Employment Act 2013 No 40 and Regulation 2014*
- *Government Sector Finance Act 2018 No 55*
- *Public Finance and Audit Act 1983 No 152*
- *Public Works and Procurement Act 1912 No 45*
- Australian Accounting Standards Board

### 3.2 Policy framework

In ensuring FRNSW abides by good governance and standards, this policy is strengthened by the principles found in the:

- *FRNSW Code of Conduct and Ethics*
- *FRNSW Conflicts of Interest Policy and Procedure*
- *FRNSW Managing Gifts, Benefits and Hospitality Policy*
- *FRNSW Fixed Assets Policy*
- *FRNSW Procurement Policy*
- *FRNSW Risk Management Policy*
- Australian Accounting Standards
- Management of Corporate Sponsorships – National Audit Office 1997
- Sponsorship in the Public Sector – ICAC 2006
- Managing Conflicts in the Public Sector – ICAC 2019
- Managing Unsolicited proposals in NSW South Wales – NSW Audit Office

## 4 Definitions and key terms

To assist with understanding the breadth of this policy, the following definitions are provided to assist interpretation.

### 4.1 Sponsorship

Sponsorship is a method by which individuals, businesses and community groups support FRNSW projects and initiatives. Formally sponsorship may be defined as a commercial arrangement in which a sponsor provides money or an in kind contribution in support of a FRNSW activity, service, equipment or event, in return for a specified benefit, usually public acknowledgement and recognition.

Appropriate record keeping must be maintained and full accountability of all monies and goods collected

### 4.2 Donations and Fundraising

Donations and fundraising are not covered by this policy. Information on these two issues can be found in the following policy documents.

- Donations                      *FRNSW Managing Gifts, Benefits and Hospitality Policy*
- Fundraising                    *FRNSW Workplace Giving Policy*

## 5 Policy principles

This policy outlines FRNSW approach to dealing with sponsorship and details the types of sponsorship arrangements FRNSW will undertake.

FRNSW has a range of responsibilities to deliver programs and services to the community. By seeking and receiving sponsorship, FRNSW provides additional resources with which to support specific activities or programs. In addition, the success and public exposure of an activity can be enhanced by sponsorship providing better engagement by the community.

## 6 Policy implementation

Generally, corporate sponsorship may be acceptable for any FRNSW activity, program or non-standard issue resource (eg: advertising, promotional materials and community-based initiatives). Items excluded from sponsorship include standard issue FRNSW uniforms, equipment, and response vehicles.

### Benefits of Corporate Sponsorship:

- Potential benefits for a sponsor are generally greater exposure and a positive association with the organisation, including:
- Opportunities to demonstrate the company's business principles
- Increased staff morale and pride through association with a 'worthwhile' service
- Naming opportunities (*eg: conferences, publications or facilities*)
- Public relations benefits

FRNSW can receive benefits from Corporate Sponsorship, including:

- An injection of resources, either a cash or 'in kind' contribution
- Providing FRNSW with an opportunity to develop better working relationships with stakeholders.
- Promoting the public profile of a program or FRNSW to a wider than normal audience, including activities which increase community awareness of a program or activity.
- The provision of advertising /promotion from social media, television, radio, newspaper, or other media.

#### Risks of Corporate Sponsorship:

While Corporate Sponsorship can offer significant benefits, these activities also potentially expose FRNSW to risk. A key risk is the potential for sponsorship to compromise or influence how FRNSW may conduct its business, for example purchasing and other contractual arrangements.

Public confidence can quickly be eroded if there is a perception that, by way of a sponsorship arrangement that FRNSW is no longer neutral, or it is implicitly promoting or endorsing a particular individual or organisations' products or services. It is important to consider whether any proposal will withstand full public scrutiny and not undermine public confidence in the neutrality and integrity of the organisation.

### 6.1 Criteria for attracting corporate sponsors

When looking for possible corporate sponsorship opportunities, begin by identifying existing or proposed programs and initiatives which:

- Could be enhanced by an injection of community or private funds, goods or services
- Would not be compromised by private sector or community involvement
- Would provide a useful, additional or enhanced service to the community; and
- Would provide public acknowledgment and recognition of the benefits for the potential sponsor.

Programs and initiatives should not be sponsored if the commercial sponsorship is likely to reduce public confidence in FRNSW's ability to impartially perform its duties.

Any sponsorship arrangement that is offered or sought by FRNSW must be underpinned with the following guiding principles:

- overall benefit to FRNSW and the community
- not create an actual, perceived or potential conflict of interest; and
- not fetter or interfere with FRNSW's compliance with and/or exercise of its legislative obligations

### 6.2 No links to procurement

Corporate Sponsorship offers to provide a product, service or funds **MUST NOT** be accepted if it is linked to a requirement that FRNSW purchase or contract to purchase goods and services in return, or the perception a donor will obtain favourable treatment during any procurement process nor access to confidential information.

Sponsorship must not be used by organisations as a means of avoiding competitive tendering by FRNSW.

### 6.3 Suitable activities for sponsorship

The general types of activities that FRNSW may consider suitable as sponsorship opportunities include activities or events such as:

- Public safety programs and projects
- Public events
- Training and education
- Facilities used for training (eg: academy site)
- Scholarships
- Awards
- Industry research
- Publications and promotional materials
- Exhibitions, and
- Conference and business forums.

### 6.4 Benefits for sponsors

The primary benefit for sponsors is a competitively priced strategy for reaching a target audience or to meet social responsibility goals. Benefits to be gained include

- A positive community image from having their name and, by extension, their product or service, favourably linked to a FRNSW activity (*but without FRNSW endorsement*)
- A positive community image as a good corporate citizen by demonstrating support for FRNSW being prepared for anything.
- Increased employee morale and pride through association with a 'worthwhile' activity or service
- Establishing links between the sponsor, FRNSW and the community
- Sponsor recognition in signage and/or plaque placement
- Opportunities for involvement in FRNSW media, advertising and promotional activities
- Recognition of the sponsorship in sponsor's publications, advertising and promotions (*providing there is no explicit endorsement of the sponsor's products or services by FRNSW*)

#### Types of Recognition

The type of recognition available to offer a sponsor to match the value of investment include:

- Tagging the activity with 'sponsored by' (for major sponsors) or 'supported by' (for minor sponsors)
- Mention in media releases, launch speeches, interviews and social media promotion
- Mention by the compere, MC, host announcements at launches/events
- License to use FRNSW's intellectual property for the event. (ie: logo)
- Inclusion of a sponsor's message in sponsored publications
- Sponsor branding (*with artwork approved by Manager, Media Marketing & Communications*) on FRNSW
  - Event signage (banners, entrance, microphone and exit signs)
  - Promotional material (direct mail, posters, flyers, giveaways)
  - Advertising (TV, radio, print and outdoor, tickets)
- Acknowledgement in event information (program, guide or magazine)

- Invitation, passes or tickets for the sponsor to attend the sponsored initiative or event
- Acknowledgement in internal FRNSW promotions (eg: Intranet)
- Branding on sponsored assets (co-branding arrangements)
- Placement of a recognition plaque or signage on machinery, sponsored vehicles, other equipment or property provided by sponsors
- Acknowledgement in competitions and surveys.

Also consider the unique benefits that FRNSW can offer, such as a guided tour of facilities or even an opportunity to undertake the 'Fire Fighter for the Day' program. This type of benefit is appropriate when it fits with FRNSW objectives and does not interfere with normal FRNSW business.

## 6.5 Sponsorship Considerations and Integrity of Process

Sponsor recognition should be within the context of the sponsored activity. At no stage must the function or integrity of FRNSW be secondary, or appear to be secondary, to the sponsor's commercial requirements. Key considerations include:

- It is important that when recognising sponsors, the recognition should fit the value of the sponsorship received.
- FRNSW or activity identification should not be subordinate to the sponsor's logos or trademarks. The FRNSW logo and initiative should be the prominent feature
- The FRNSW right to veto inappropriate advertising content
- Use of FRNSW corporate brand must be clearly defined and approved by Media Marketing & Communications.
- FRNSW will not grant naming rights for any activity or program. The sponsor's name cannot form part of the name by which the activity is known (eg: The ABC Company Fire Safety Program). The program is owned by FRNSW, not the body sponsoring it.
- Endorsement of the sponsor's company, products or services is not accepted.

### Integrity Considerations

Any activities relating to attracting and engaging contractors should ensure the integrity of the process and decisions can be upheld. This would include the importance of NOT:

- Pressuring or appearing to pressure a potential sponsor because of a relationship with FRNSW or where they are potentially subject to inspectorial, regulatory, or administrative activities,
- Causing a perception that a potential sponsor will benefit unfairly from the sponsorship in other areas (eg: procurement, early access to initiatives etc)

Any FRNSW employee (*commonly known as a Public Official*) or immediate family member(s) who have or seek to have employment with entities that provide sponsorship presents a Conflict of Interest.

Any conflicts not disclosed to permit FRNSW to appropriately manage said conflict will be subject to Professional Standards referral/assessment.

## 6.6 Sponsorship assessment principles and approval

The principles applied by FRNSW in assessing sponsorship proposals are based on the Independent Commission Against Corruption guide “*Sponsorship in the Public Sector*” 2006.

All sponsorship proposals will be assessed by the Sponsorship Advisory Group (SAG). This group will consist of:

- Executive Director, Office of the Commissioner      Chair
- Executive Officer, Office of the Commissioner      Group Secretary
- Manager, Media Marketing & Communications
- Financial Directorate Representative
- Governance and Legal Office Representative
- Directorate Representative (area seeking the sponsorship)

FRNSW Strategic Procurement & Contract Services will not be a member of the SAG but will be consulted to confirm whether potential sponsors are current or potential suppliers to the organisation. This advice will form the only input into the overall assessment/evaluation process.

The SAG is an advisory body that will recommend the endorsement of any sponsorship proposal. Approval to engage in a sponsorship agreement rests with the Executive Leadership Team (ELT).

Members of the Sponsorship Advisory Group who are currently involved in (*recently involved in or likely to be involved in within a 6 months window*) a tender evaluation process that includes a potential sponsorship company under consideration must be excluded and replaced by another member to safeguard probity across the sponsorship process.

## 6.7 Sponsorship assessment criteria

Potential sponsorships will be assessed by SAG against the following criteria:

1. Total financial benefit
2. Total ‘in kind’ benefit
3. Quantity and quality of flow-on benefits to FRNSW activities
4. Sponsor’s reach into the community
5. Sponsor’s brand value and reputational stance
6. Match to activity being sponsored
7. Sustainability of sponsorship agreement, and
8. Value of benefit to sponsor in comparison to the value of sponsorship being proposed

## 6.8 Sponsorship exclusions

In accordance with the ICAC principles, FRNSW will not undertake sponsorship that:

- Require or imply FRNSW’s explicit endorsement of commercial products, services, companies, political parties or individuals.
- Limit FRNSW’s ability to carry out its legislative functions
- Restrict access to FRNSW’s sponsorship assets by the widest audience possible.

- Are not consistent with FRNSW's social justice principles of equity, participation, rights and accessibility for all within the community.
- Benefit individual FRNSW employees, or their family/friends, either directly or indirectly.
- Allow ownership and control of sponsored assets to be removed from FRNSW
- Pose a conflict with the broader policies and practices of FRNSW
- Pose a conflict between the objective and values of FRNSW and those of the sponsor
- Will diminish, or be seen to diminish, the public's confidence in FRNSW; and
- Any activities deemed by the Commissioner to not be in the best interests of FRNSW.

FRNSW will not accept sponsorship from entities that derive a principal source of revenue from any of the following activities:

- Pornography and sexual services
- Gambling
- Sale of alcohol
- Environmentally unsustainable practices
- Production or the sale of tobacco, and
- Armaments and weapons manufacture/supply

Sponsorships with the following monetary issues will not be considered:

- If the sponsorship investment is less than the cost of the event,
- Where a price is placed on FRNSW's sponsorship package that is not fair in comparison to marketplace prices, undermines the perceived quality of the package or does not represent value for money for FRNSW.
- Where research conducted by FRNSW is required to establish the viability of undertaking a sponsorship, where that research is disproportionate to the value of the sponsorship itself.

## 6.9 Discretion to reject sponsorship

FRNSW retains the right not to accept sponsorship from any entity for any reason, which may not necessarily be provided to a potential sponsor.

## 6.10 Conflicts of interest and personal benefits

Any sponsorship arrangement that FRNSW undertakes must not compromise FRNSW's reputation, public image, probity, or its ability to fulfil its legislative functions.

Any sponsorship arrangements must not impose or imply conditions that would limit or be perceived to limit FRNSW's ability to carry out its functions fully and impartially. There should be no actual or perceived conflict between the objectives and values of FRNSW and that of the sponsor.

All sponsorship proposals and assessment will be subject to an evaluation process which will entail the requirement for the declaration of conflicts of interest by all parties. Prior to authorising any sponsorship agreement, Executive Director, Office of the Commissioner will satisfy themselves there has been no conflict of interest across the life of the sponsorship discussions, negotiations, and agreement.

Information will be provided to potential sponsors relating to expectations, objectives, ethical requirements, sponsor benefits sponsorship procedures and the criteria against which proposal will be assessed.

Conflicts of interest arising from personal relationships or financial arrangements of staff involved in sponsorship assessment, approval or agreement administration will be managed in accordance with the conflict of interest provisions of the FRNSW *Code of Conduct and Ethics*.

Employees (or representative for FRNSW) must not seek or receive personal benefit or be perceived to receive a personal benefit from a sponsorship. Any contribution from the sponsor must be received by FRNSW, not directly to an individual, and must be seen to benefit FRNSW and not an individual.

Sponsors should be aware of and comply with the FRNSW's *Statement of Business Ethics*

### 6.11 Attracting sponsors

In order to ensure equitable opportunities for the business community and other interested parties to consider sponsorship, FRNSW will promote this opportunity in one of the following ways

1. Expression of Interest Advertisement

FRNSW will place an open Expression of Interest advertisement on its website to ensure the business community and other relevant government and non-government agencies have the chance to participate in sponsorship opportunities.

2. Sponsorship Broker

FRNSW may engage a sponsorship broker to assist identify potential sponsors for sponsorship opportunities and initiates direct contact on behalf of FRNSW.

Where a broker is engaged, procurement conditions apply in terms of the engagement and the broker is required to abide by the FRNSW *Code of Conduct and Ethics* and relevant business rules and processes.

3. Direct Approach or Unsolicited Proposal

Where an organisation (*or other*) makes a direct approach/unsolicited proposal to sponsor FRNSW, such approach will be managed in the same way as if the proposal was received under an Expression of Interest process and must meet the same requirements before acceptance.

### 6.12 Engaging sponsors

Approval to engage a sponsorship broker and execute a sponsorship agreement rests with the Executive Director, Office of the Commissioner. Financial decisions in relation to engaging sponsorship funds and subsequent expenditure will be made in accordance with FRNSW Financial Delegations.

### 6.13 Sponsorship Agreement

A sponsorship agreement will be executed for each sponsorship in accordance with FRNSW's approved procedures, delegations, probity arrangements and documentation.

The sponsorship agreement will not impose or imply conditions that would limit, or appear to limit, FRNSW's ability to carry out its functions fully and impartially.

### 6.14 Open and transparent management

Information about sponsorship contracts valued over \$150k will be published as mandated under NSWG legislation. Good practice would suggest that as an open and transparent agency, FRNSW would publish all sponsorship arrangements.

FRNSW through Media Marketing & Communications will retain a register of all sponsorship agreements

Details of each sponsorship will be recorded in FRNSW's *Annual Report*

### 6.15 Sponsorship evaluation

Regular financial and performance audits will be conducted in relation to sponsorship agreements. The SAG will ensure that all sponsorships are subject to a review at least annually or more frequently depending on the complexity of the arrangement.

## 7 Roles and responsibilities

The Sponsorship Advisory Group will:

- Oversee and provide recommendations to management and decision-makers about identified sponsorship opportunities
- Consider all sponsorship opportunities and recommend that preliminary discussions can be held with potential sponsors
- Conduct formal risk assessment and evaluation processes against FRNSW's selection principles, criteria, and exclusions, upon sponsors who have expressed an interest in developing a formal proposal. The outcome of the risk assessment in the first instance will determine whether sponsorship opportunities will progress
- Review formal sponsorship agreements and make recommendations to the Commissioner for approval
- Appoint project teams responsible for managing sponsors
- Ensure Finance Directorate (Financial Operations) are engaged to provide advice on the management of Goods and Services Tax (GST) implications on each sponsorship proposal.

Media, Marketing & Communications Unit will:

- Manage the relationship with the sponsorship broker
- Co-ordinate the SAG meetings and evaluations
- Manage the sponsorship register
- Provide reports to FRNSW's Executive Leadership Team as required in relation to sponsorship activity

- Review and maintain policy and procedures
- Raise awareness of sponsorship processes
- Maximise public relations opportunities from new and ongoing sponsorships
- Provide guidance to staff as required

All FRNSW employees will:

- Adhere to this policy and associated procedures when involved with sponsorships.
- Maintain awareness of their responsibility for probity across all aspects of sponsorship. The *Code of Conduct and Ethics* and policies on conflict of interests, gifts and benefits and risk management are useful tools for staff in managing interactions in relation to sponsorships.

## 8 Training and support

To ensure compliance with the process and format requirements, this policy will be supplemented with published procedures. Media Marketing & Communications staff will be available for enquiries and assistance in all aspects of sponsorship identification, assessment, and ongoing management.

## 9 Monitoring and review

This policy will be reviewed every three (3) years unless otherwise required, to determine if there are any changes needed to maintain compliance with current legislation, government policy or recommendations stemming from oversight agencies.

## 10 Further information

Further information relating to the Sponsorship, Donation and Fundraising Policy should be directed to the Media, Marketing and Communications Unit.

## 11 Document information

### 11.1 Related documents

- Corporate Sponsorship Procedures
- FRNSW Sponsorship Agreement

### 11.2 Document control

<b>Policy Manager</b>	Media Marketing & Communications
<b>Contact Officer</b>	Manager Media Marketing & Communications
<b>Contact No</b>	(02) 9265 2907
<b>Document type</b>	Policy
<b>Applies to</b>	<input checked="" type="checkbox"/> Firefighters <input checked="" type="checkbox"/> Community Fire Unit Members <input checked="" type="checkbox"/> Administrative and Trades Staff <input checked="" type="checkbox"/> Contractors and Consultants
<b>Status</b>	Draft
<b>Security</b>	For Official Use Only
<b>File Reference</b>	D20/56827
<b>Review Date</b>	30 September 2023
<b>Rescinds</b>	NSW Fire Brigades Sponsorship Policy (2008), In Orders 2008/24
<b>Copyright</b>	© State of New South Wales through Fire and Rescue NSW

### 11.3 Revision history

Version	Date	Status	HPE RM Ref	Details
01 Draft A	27/08/2020	Approved	D20/56827	New Policy