

Gifts & Hospitality Policy

This policy applies to Charlton Premier Skills and all staff of its subsidiaries.

1. Purpose & Principles

This policy establishes clear standards for giving/receiving gifts and hospitality to:

- Maintain integrity and impartiality
- Prevent conflicts of interest
- Comply with Bribery Act 2010
- Protect our charitable reputation

Core Principle: Any gift/hospitality must be *reasonable, proportionate* and *transparent*.

2. Definitions

Category	Definition	Examples
Gift	Items of value given/received	Cash, vouchers, merchandise
Hospitality	Entertainment or services	Meals, tickets, travel
Corporate Gift	From suppliers/partners	Branded merchandise

3. Acceptable Limits

Receiving Gifts/Hospitality

Value	Action Required
Under £25	No declaration needed
£25-£100	Record in department log
Over £100	Written approval from [CEO/Trustee Chair]
Over £250	Typically refused (exceptions require Trustee approval)

Prohibited Items:

- X Cash or cash equivalents (gift cards over £50)
- X Frequent hospitality from same source
- X Anything that could create obligation

Giving Gifts/Hospitality

- ✓ Must align with charitable purposes
- ✓ Limited to £25pp for participant rewards
- ✓ Board approval required for expenditure over £500

4. Declaration Process

Staff/Volunteers

1. Complete **Gift & Hospitality Form** (Appendix A)
2. Submit to line manager within 5 working days
3. Entered in central register

Trustees

1. Declare at next Board meeting
2. Recorded in minutes
3. Added to Register of Interests

5. Special Circumstances

Cultural Gifts

- Traditional tokens may be accepted if:
 - Refusal would cause offence
 - Recorded regardless of value
 - Consider donating to charity if inappropriate to retain

Fundraising Gifts

- Major donor benefits must be:
 - Pre-approved by Fundraising Committee
 - Disclosed in Annual Report if over £1,000 value

6. Consequences for Breaches

Depending on severity:

- Repayment of gift value
- Disciplinary action
- Police referral for bribery cases
- Charity Commission reporting

7. Annual Review

- Register audited by Finance Committee
- Policy reviewed by Trustees
- Training provided to all staff

Approved by:

Dennis Ssemwogerere
Director of Programmes
Charlton Premier Skills
19/04/2025

Appendices:

- A. Gift Declaration Form
- B. Hospitality Approval Process

Related Policies:

- Conflicts of Interest
- Anti-Fraud Policy
- Code of Conduct

All gifts over £100 must be registered within 7 days.

Trustees review the Gift Register quarterly.

This policy applies equally to all staff, volunteers and trustees regardless of seniority.