



- 3.2. Declarations shall be recorded in CCT's Gifts and Hospitality Register. The register is maintained by the Secretary and is publicly available. (See section 6 for details of how to make a declaration).
- 3.3. It is the responsibility of every member to ensure that they are not placed in a position that risks compromising CCT values, reputation or statutory duties.
Members should not:
 - 3.3.1. be seen to be securing valuable gifts and hospitality by virtue of their role in or relationship with CCT;
 - 3.3.2. accept any gift or hospitality if acceptance could give the impression that they have been influenced by the giver while acting in an official capacity;
 - 3.3.3. accept any gift or hospitality if to do so would be in breach of CCT's constitution, OSCR regulations or the law.
- 3.4. This Policy also applies to a member's close relatives (such as their child, parent or spouse) if it could be argued or perceived that the gift or hospitality is in fact for the member's benefit.
- 3.5. In exercising judgement as to whether to accept a gift or hospitality, members should ask themselves what the public perception would be if information about the gift or hospitality were to become common knowledge.

4. Accepting gifts

- 4.1. Members may retain any gift valued at £30 or under that is given in recognition of their work on behalf of CCT.
- 4.2. For a gift exceeding a value of £30 but less than £100, members should exercise good judgement in deciding whether to accept it based on the requirements outlined in section 3 above.
- 4.3. If a member decides to accept the gift, the following options are suggested:
 - Raffle the gift and donate the proceeds to CCT;
 - Donate the gift to CCT;
 - Make a donation to CCT equivalent to the value of the gift.
- 4.4. For a gift exceeding £100 in value, approval to retain the gift shall be sought from the Board of Trustees.

5. Accepting hospitality

- 5.1. Offers of hospitality in a member's role for CCT should only be accepted where there is a direct link to their volunteering duties on behalf of CCT and a genuine business reason can be demonstrated, for example:
 - Attendance at a conference or publicity event that provides complimentary subsistence, travel and accommodation (this does not need to be declared on the register except if a gift is also received (see section 4).
 - Attending a free training course.
 - Attending a reception to network on behalf CCT.

- 5.2. It is recognised that, in the course of carrying out their duties for CCT, a member will need on occasion to ensure good relationships with existing and future stakeholders, and that this may involve for example, the receipt of modest working lunches and dinners. These are acceptable where there is a genuine business reason.
- 5.3. Hospitality invitations to purely social events that arise as a result of a member's work for CCT should be considered very carefully before accepting. In such circumstances, it may be much more difficult to substantiate a genuine business reason.

These invitations shall be recorded in the register when received, whether accepted or declined.

6. Declaration of gifts and hospitality

- 6.1. Members should make any declaration as soon as possible after the offer or receipt of gifts or hospitality. All declarations shall be sent by email to the Chair and should include the following information:
 - 6.1.1. The date of offer of the gift or hospitality was made, and the date of the hospitality event where applicable;
 - 6.1.2. the name, job title and organisation of the giver;
 - 6.1.3. the nature and purpose of the gift or hospitality received, accepted or declined;
 - 6.1.4. the name of any other organisation involved;
 - 6.1.5. the estimated value of the gift or hospitality.
- 6.2. Members should consult the Chair for any guidance required on this policy. In general terms, if a member has any doubt about whether an item should or should not be declared, they are advised to declare it.

7. Breach of policy

Any member who fails to declare the offer, acceptance or refusal of gifts or hospitality in accordance with this policy may be in breach of CCT's Code of Conduct and subject to action under the charity's Disciplinary Procedure.

8. Ownership and review

This policy is owned by the Chair, who is responsible for updating it when required. The Board of Trustees shall review the contents of, and compliance with this policy periodically.

9. Notes and additional information

- 9.1. In the event that any element of this policy appears to conflict with the Constitution of Coulter Community Trust, the latter shall take precedence as the definitive document.
- 9.2. In this document, the term *member* refers to both ordinary and associate members, and trustees of CCT.