



Gifts and Hospitality Policy

Acting with integrity and transparency

Assisting Parents with Children Affected by Mental Health
Registered Charity Number 1186256

Version	1.0
Adopted	March 2026
Approved by	The Board of Trustees, signed on its behalf by Lauren Ridley, Chair of Trustees
Policy owner	CEO
Next review	March 2027, or sooner if legislation or guidance changes
Applies to	All trustees, staff, volunteers, placement students and contractors

At a Glance

Integrity first: Everyone at APCAM must act with integrity. Gifts and hospitality must never influence, or appear to influence, our decisions or the support we provide.

Gift or hospitality	What to do
Small token under £25 (card, chocolates, flowers)	May accept. Record in the gifts register.
Worth £25 or more, or several from the same person	Politely decline, or accept on behalf of APCAM with CEO approval. Record.
Cash, vouchers, loans or legacies to you personally	Always decline. Report to the CEO.
Anything offered during a funding, procurement or recruitment decision	Always decline. Report to the CEO.

Contents

1. Purpose and Scope
2. Principles
3. Gifts from Service Users and Families
4. Gifts to Service Users
5. Hospitality and Gifts from Partners, Suppliers and Funders
6. Giving Gifts and Hospitality
7. Donations to APCAM
8. The Gifts and Hospitality Register
9. Trustees and Conflicts of Interest
10. Breaches
11. Monitoring and Review
12. Related Policies and Legal Framework

1. Purpose and Scope

Families often want to say thank you, and that is a kind and natural thing to do. Partners, suppliers and funders may also offer hospitality. This policy makes sure that everyone at APCAM handles gifts and hospitality in a way that is open, fair and protects both the people we support and our reputation.

It applies to all trustees, staff, volunteers, placement students and contractors, and to gifts and hospitality offered or given in connection with APCAM, whether at work or outside it.

2. Principles

- Gifts and hospitality must never influence, or be seen to influence, any decision.
- No service user should ever feel they need to give a gift to receive support.
- Everything is recorded in the gifts and hospitality register.
- If in doubt, ask the CEO, and decline.

3. Gifts from Service Users and Families

- Small tokens of thanks with a value under about £25, such as a card, chocolates, flowers or a handmade item, may be accepted and recorded.
- Gifts of greater value, repeated gifts, cash, vouchers or anything that could create a sense of obligation must be politely declined. Explain kindly that APCAM's rules do not allow it, and suggest a card or a donation to APCAM if they would like.
- Food or treats for a team, such as a tin of biscuits, can be shared and recorded.
- Staff and volunteers must never accept money, loans, legacies, or be named in a will by a service user. Any such offer must be reported to the CEO.
- Be sensitive to cultural and religious customs around giving, and to families who may be on low incomes.

4. Gifts to Service Users

Staff and volunteers must never give personal gifts to children, young people or families, as this can blur boundaries and create favouritism. APCAM may provide items organisationally, such as small rewards, snacks at WeGame sessions, celebration cards or essential items through hardship support, as long as these are approved, fair and recorded where appropriate.

5. Hospitality and Gifts from Partners, Suppliers and Funders

- Modest hospitality, such as refreshments at a meeting or a working lunch, may be accepted.
- Invitations to events, meals or travel with a value of £25 or more must be approved in advance by the CEO, or by the Chair of Trustees for the CEO and trustees, and recorded.
- Gifts or hospitality must never be accepted from anyone involved in a current tender, procurement, funding or recruitment decision with APCAM.
- Promotional items of low value, such as pens or calendars, may be accepted.

6. Giving Gifts and Hospitality

APCAM may offer modest hospitality, such as refreshments for volunteers, partners or events, and small thank-you gifts to volunteers. These must be reasonable, proportionate, a good use of charitable funds, and approved by the CEO. APCAM will never offer anything intended to influence a decision by a funder, commissioner or public official.

7. Donations to APCAM

Donations offered to APCAM as a charity are welcome and are handled in line with our fundraising practice. Staff should pass any offer of a donation to the CEO. Donations from service users should be handled sensitively and never expected. The only donation APCAM invites from families it supports is the optional donation for the therapy service, set out in the Fundraising and Donations Policy, and staff and volunteers must not otherwise encourage service users to give.

8. The Gifts and Hospitality Register

The CEO keeps a register of all gifts and hospitality offered, accepted or declined, including the date, who offered it, its approximate value, who it was offered to, and what happened. The Board of Trustees reviews the register at least once a year.

9. Trustees and Conflicts of Interest

Trustees must not receive any financial benefit from APCAM, including gifts or hospitality funded by APCAM beyond what is reasonable for their role, except as permitted by clause 6 of the APCAM Constitution. Any trustee offered a gift or hospitality connected with APCAM must declare it, and must declare any interest that could create a conflict of interest or loyalty. They must then leave any discussion and decision on the matter, and not vote or count towards the quorum (clause 7).

10. Breaches

Failing to follow this policy may lead to disciplinary action. Offering or accepting a bribe is a criminal offence under the Bribery Act 2010, and any suspected bribery will be reported to the Board and, where appropriate, to the police and the Charity Commission.

11. Monitoring and Review

The Board of Trustees will monitor how this policy is working through regular reports from the CEO, feedback from staff, volunteers and service users, and learning from any incidents or complaints. This policy will be reviewed annually by the policy owner, or sooner if legislation, statutory guidance or APCAM's services change.

12. Related Policies and Legal Framework

12.1 Related APCAM policies

- Professional Boundaries Policy 2026
- Code of Conduct 2026
- Whistleblowing Policy 2026
- Safeguarding Policy 2026 (including WeGame)
- Child Protection Policy and Procedures 2026
- Volunteer Policy 2026

12.2 Legislation and guidance

- APCAM Constitution (Foundation model CIO constitution, last amended 20 September 2019)
- Bribery Act 2010
- Charities Act 2011 (trustee duties and conflicts of interest)
- Charity Commission guidance: Managing conflicts of interest in a charity
- Charity Commission guidance: Internal financial controls for charities (CC8)

Approval

Approved by	The Board of Trustees, by resolution in line with clause 13 of the APCAM Constitution
Signed on behalf of the Board	Lauren Ridley, Chair of Trustees
Signature	
Date adopted	March 2026
Next review	March 2027
Registered address	APCAM, 1 The Green, Alvescot, Oxfordshire OX18 2QD. Registered Charity Number 1186256