Gifts and Hospitality Policy

Date last reviewed: 8th May 2026

Date next review due: 8th May 2027

1. Overview

Thread Ahead is a charity with a dual purpose: to provide refugees with choice and dignity in how they dress and to increase circularity in the fashion industry. We run events where excess stock is donated directly to refugees and asylum seekers, saving it from landfill or incineration.

Occasionally recipients or those that care about the work we undertake will seek to provide hospitality or gifts to thank our staff or to raise money for the charity. There is no desire to stop these gifts being received under a safe and fair procedure, but we must ensure that hospitality is for the benefit of the charity and not individuals.

This policy also covers the giving of gifts by Thread Ahead and the use of reward schemes or loyalty benefits that arise from spending on behalf of the charity.

The key principle of this policy is transparency. All offers of gifts or hospitality — whether accepted or declined — must be declared and recorded.

2. Scope

This policy applies to:

- All paid staff (full-time, part-time, and temporary or casual)
- All volunteers

- All trustees
- Contractors, consultants, and agents acting on behalf of Thread Ahead

This policy covers gifts and hospitality offered to or by any of the above, whether from or to individuals, organisations, or companies outside Thread Ahead.

This policy does not cover:

- Gifts in kind - goods or services donated directly to Thread Ahead as charitable donations (e.g. clothing for redistribution)
- Cash donations to Thread Ahead
- Promotional items of purely nominal value (e.g. a branded pen, notepad, or small food item). These do not need to be reported, provided they clearly have no financial value and no intent to influence.

For the avoidance of doubt, 'gift' in this policy means any payment, item, service, or benefit given to an individual in connection with their role at Thread Ahead, not directly to the charity itself.

3. Financial Thresholds

The Bribery Act 2010 does not set a fixed monetary limit for gifts and hospitality, emphasising instead that they must be reasonable and proportionate. To give practical guidance, Thread Ahead sets the internal thresholds in the table below. These thresholds should be considered as guidelines, not an automatic right to accept. The appropriateness of intent and timing are equally important - see Section 5.

Value	Gifts	Hospitality
Up to £25	Notify line manager. No formal reporting required unless you have any doubt.	Routine working meals or refreshments. Notify line manager.
£25 – £100	Must be declared on the Declaration Form and recorded on the Gifts Register.	Must be declared and approved by line manager before attending.
Over £100	Must normally be declined. Thank the sender and, if appropriate, invite them to donate to Thread Ahead instead. Declare on the Register regardless.	Requires approval from the CEO and, for trustee-related events, the Chair. May be declined if deemed inappropriate.

4. Receiving Gifts and Hospitality

4.1 Gifts

If you are offered or receive a gift in connection with your role at Thread Ahead, you must:

- Report it to your line manager as soon as practicable after it is offered or received.
- Provide details of the nature of the gift, its approximate value, and the identity of the sender.
- If requested by your line manager, complete a Declaration Form (see Sections 3 and 8) and submit it to your line manager. A copy of the Declaration Form can be found at the end of this policy.

Your line manager will decide whether you may retain the gift, whether it should be shared among colleagues, or whether it should be returned or donated to Thread Ahead. For gifts over £100, the default position is to decline, as per Section 3 of this policy.

Where a gift cannot easily be returned (e.g., perishable food), the line manager should decide promptly and the decision must still be recorded.

4.2 Hospitality

If you are invited to an event in connection with your role at Thread Ahead, this will be considered hospitality. You should:

- Notify your line manager of any such invitation before accepting.
- Complete a Declaration Form if the estimated value of the hospitality exceeds £25.
- Not attend if your line manager determines the event is inappropriate, or if attendance would create a real or perceived conflict of interest.

For events that are genuine, proportionate, and reasonable, you may attend with your line manager's approval. If the event falls within your normal working hours, attendance is subject to agreement about time off work.

Where hospitality is offered that would benefit the charity as a whole (e.g., tickets to a fundraising event), the line manager should assess whether the invitation can be redirected to benefit Thread Ahead rather than an individual.

5. Intent, Timing, and Conflicts of Interest

The value of a gift or hospitality is not the only consideration. Intent and timing are equally important:

- Intent: A gift or hospitality is more likely to be problematic if it could reasonably be seen as intended to influence a decision, secure a contract, or reward past conduct rather than as a genuine token of appreciation.

- Timing: Extra caution is required when a gift or invitation is received during or close to a procurement process, contract renewal, funding decision, or any situation where Thread Ahead is making a decision that affects the offeror. Such offers must be declared immediately regardless of value.
- Conflict of interest: If you have any existing or potential conflict of interest involving the person or organisation making the offer, you must disclose this on your Declaration Form and to your line manager. You should recuse yourself from any related decision. This policy should be read alongside Thread Ahead's Conflicts of Interest Policy.

6. Giving Gifts on Behalf of Thread Ahead

Thread Ahead may, on occasion, wish to thank volunteers, partners, donors, or supporters with a modest gift. Any gift given on Thread Ahead's behalf must be:

- Modest and proportionate (ordinarily no more than £25 per recipient).
- Appropriate to the relationship and clearly charitable in character.
- Approved in advance by the CEO or, if the CEO is the giver, by the Chair.
- Recorded on the Gifts Register.

Cash gifts must never be given to individuals on behalf of Thread Ahead. Gifts to government officials, grant funders, or statutory bodies should be avoided entirely.

7. Loyalty Schemes, Rewards, and Supplier Incentives

Some suppliers or contractors may offer reward schemes, loyalty points, cashback, free gifts, or discount vouchers in return for ordering services or products on behalf of Thread Ahead. The following rules apply:

- Any loyalty points, air miles, cashback, rewards, or other benefits earned through expenditure of Thread Ahead funds belong to Thread Ahead, not to the individual making the purchase.
- Such benefits must be declared to your line manager.
- They must be used for Thread Ahead's benefit, not for personal use.

Where a supplier offers incentives that could influence purchasing decisions, the CEO must be informed and procurement must be based on the best interests of Thread Ahead, not on the availability of personal rewards. Using a supplier primarily because of personal incentives may constitute a disciplinary offence.

8. Anti-Bribery and Anti-Fraud

Thread Ahead is committed to complying with the Bribery Act 2010 and the broader requirements of the Economic Crime and Corporate Transparency Act 2023 (ECCTA).

Under the Bribery Act 2010, a bribe is a financial or other advantage offered or received with the intention of inducing or rewarding improper performance of a function or activity. Thread Ahead depends on all staff, volunteers, and trustees to maintain the highest standards of ethical conduct.

All those covered by this policy must:

- Remain vigilant in preventing, detecting, and reporting potential bribery.
- Report any suspected or actual bribery attempts to their line manager or a trustee immediately.
- Report concerns that other individuals associated with Thread Ahead may be offering or receiving bribes.

Under ECCTA, Thread Ahead is also committed to preventing fraud. This policy forms part of the wider framework of adequate procedures to prevent financial crime.

If it is found that a supplier was used primarily because of personal gifts or incentives rather than the best interests of Thread Ahead, this may be treated as gross misconduct and could result in disciplinary action, including dismissal. Serious cases may be referred to the Charity Commission or the Serious Fraud Office.

9. The Gifts and Hospitality Register

Thread Ahead maintains a central Gifts and Hospitality Register. The Register is owned by the CEO and reviewed by the Board of Trustees at least annually.

The Register must record all offers of gifts or hospitality regardless of whether they were accepted or declined. Each entry should include:

- The date of the offer or receipt
- The name and role of the person offered the gift or hospitality
- A description and estimated value
- The name of the offeror and their relationship to Thread Ahead
- Whether any pending procurement or decision is involved
- Whether the offer was accepted or declined, and the reason
- The name of the line manager or trustee who approved or reviewed the decision

The Register must be stored securely and be available to auditors and the Board of Trustees on request. It should be retained in accordance with Thread Ahead's data retention policy.

Where the CEO is the recipient of a gift or hospitality, the declaration must be reviewed and approved by the Chair of Trustees, not by the CEO themselves.

10. Specific Guidance for Trustees

Trustees are subject to the same rules as staff and volunteers. In addition:

- Any trustee receiving a gift or hospitality from an existing or prospective funder, contractor, or supplier must declare this to the Chair at the earliest opportunity.
- The Chair's own gifts and hospitality must be declared to another designated trustee.
- Trustee declarations are reported to the full Board at least annually as part of the Register review.

11. Raising Concerns

Thread Ahead encourages a culture of openness and transparency. If you are unsure whether a gift or offer of hospitality is acceptable, you should err on the side of caution and speak to your line manager or a trustee before accepting.

If you have concerns that this policy is not being followed, or that bribery or fraud may be taking place, you should report this to the CEO or the Chair of Trustees. Thread Ahead is committed to ensuring that no one suffers any detriment for raising concerns in good faith. See also Thread Ahead's Whistleblowing Policy.

12. Review of This Policy

This policy will be reviewed annually by the Board of Trustees to ensure it remains up to date and reflects the needs of the organisation. The next scheduled review date is May 2026.

Any significant change in legislation or Charity Commission guidance may prompt an earlier review.

Gifts and Hospitality Declaration Form

Complete for all offers of gifts or hospitality valued at £25 or more, or where there is any doubt. Submit to your line manager. All entries are recorded on the central Gifts Register.

Your full name and role in the organisation	
Date of offer/receipt	
What were you offered/provided?	
Approximate value (£)	
Who offered this (name and organisation)?	
What was the stated purpose?	
Is the offerer currently involved in	

any pending procurement, contract, funding or decision by Thread Ahead?	
Was the offer accepted or declined?	
Line manager/trustee views:	
Final decision:	
Date recorded on register:	
Your declaration: 'I confirm I have no conflict of interest in relation to this offer, or if I do, I have described it above.'	**Signature:** **Date:**
Line manager/trustee signature	**Signature:** **Date:**