



# DECLARATION OF GIFTS AND HOSPITALITY POLICY

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# Introduction

CIMSPA is the professional development body for the UK's Sport and Physical Activity workforce. As the champions of professionalism and integrity, CIMSPA aims to provide high-quality standards in all its activities and services. CIMSPA strives to achieve transparency in its operations and ensure that its People do not use their position to request, receive or agree financial or other advantage which may imply improper obligation and result in the improper performance of functions or activity relating to CIMSPA's operation.

## Scope

This policy applies to all of CIMSPA's People, which includes but is not limited to: employees, Board trustees, sub-committee members, contractors, quality assurance assessors, internal verifiers, consultants and volunteers.

## Purpose

This Declaration of Gifts and Hospitality Policy outlines CIMSPA's stance on the receipt of gifts and hospitality and the criteria for which CIMSPA's People must declare the receipt of gifts and hospitality. This policy aims to clearly outline the process that must be followed by CIMSPA's People when declaring the receipt of gifts and hospitality and ensure that CIMSPA's People operate in compliance with the Bribery Act 2010.

## Policy

### Gifts

In the context of this policy gifts refers to items which are given to CIMSPA's People by an individual or organisation outside of CIMSPA. CIMSPA does not prevent its People from accepting gifts however our policy encourages CIMSPA's People to consider if in the eyes of the public, the receipt and acceptance of such a gift could be construed to compromise personal judgement.



CIMSPA categorises gifts based on monetary value and does not require its People to declare gifts with a value of less than £10. For gifts that hold financial value of less than £10, which may include but is not limited to merchandise such as pens and pads offered at conferences, CIMSPA's People are not required to record these on the register of gifts and hospitality and may retain the gifts for their personal use.

For gifts offered with a financial value of greater than £10, CIMSPA's People must declare these on the CIMSPA register. CIMSPA's People are not discouraged from accepting gifts offered with a financial value of £10-£25, however it is advised that this is not kept by CIMSPA's People for personal gain and is shared across the organisation, donated to charity or raffled for charity. For offers of gifts with a financial value greater than £25, CIMSPA's People should not accept the gift and must also declare the offer on the register. CIMSPA understands that in certain circumstances it may be difficult to refuse such a gift and, in such cases, approval from the Chief Executive Officer (CEO), Chief Strategy Officer, or Chief Operating Officer must be attained prior to acceptance. Gifts of such a nature will be donated to charity or held by CIMSPA as an organisation, not the person to whom the offer was made.

In the event that a gift is offered which in the eyes of the public could be seen to compromise judgement and bring the reputation of CIMSPA into disrepute, CIMSPA's People are encouraged not to accept this and always err on the side of caution. For gifts of such a nature, CIMSPA's People must record offers on the register of gifts and hospitality, even if the gift is not accepted. In the event that it is not possible to refuse such a gift, CIMSPA's People must declare the gift and then judgement will be made by the CIMSPA Senior Leadership Team as to the handling of the gift. In such cases the gift may be donated to charity or held by CIMSPA as an organisation, not the person to whom the gift was sent.

All gifts sent to the CIMSPA office, as opposed to a named individual will be shared between CIMSPA's People and not taken by a single individual. Gifts received through the post with a financial value greater than £25, should not be kept and will be donated to charity or held by CIMSPA as an organisation, not the person to whom the offer was made. All gifts received through the post with a financial value greater than £10 must be recorded on the register of gifts and hospitality by the individual who signs for or opens the gift.

If CIMSPA's People are unsure on the appropriateness of accepting a gift they should speak to CIMSPA's CEO, Chief Operating Officer or Chief Strategy Officer for advice.

## Hospitality

CIMSPA understands that strong relationships with stakeholders is crucial to the day to day operation and success of CIMSPA, and therefore there may be circumstances in which its People will be required to accept offers of hospitality, so as to not compromise such working relationships.

In the context of this policy hospitality includes but is not limited to refreshments, meals and accommodation offered to CIMSPA's People and should only be accepted where there is a clear and transparent business reason for doing so.

Offers of hospitality that hold a financial value of less than £10, such as refreshments at a meeting can be accepted by CIMSPA's People and do not need to be recorded on the register.

For offers of hospitality with a financial value of greater than £10, CIMSPA encourages its People to consider the reason for the offer and if the acceptance of such an offer is justifiable in terms of CIMSPA's business operations, which may include the support of CIMSPA's strategic objectives.

Offers of hospitality for which there is no business driver to accept, should not be accepted. When determining the appropriateness of an offer of hospitality it is encouraged that CIMSPA's People err on the side of caution. If its People are unsure on the appropriateness of accepting a hospitality offer they should speak to the CIMSPA CEO, Chief Operating Officer or Chief Strategy Officer for advice.

All offers of hospitality with a financial value greater than £10 must be recorded on the CIMSPA register of gifts and hospitality, regardless of if the offer of hospitality was accepted or not.

## Considering Offers of Gifts or Hospitality

When accepting offers of gifts and hospitality, in line with the conditions outlined above CIMSPA encourages its People to ensure if considers the following factors.

### Conflicts of Interest

When considering offers of gifts and hospitality, CIMSPA encourages its People to take into full consideration the relationship between CIMSPA and the individual or organisation from who the offer has come. If there is any possibility of potential conflicts arising by accepting the offer, either in the eyes of CIMSPA's People or the public, offers should not be accepted.

### Frequency of Offers



In the event that an individual or organisation is offering gifts or hospitality of a disproportionate frequency, it is important to consider the perception of the public when accepting such offers, and the potential for implications of improper obligation to an individual or organisation.

### **Reason for Accepting**

When considering whether to accept an offer of gifts or hospitality, CIMSPA's People must consider if there is a clear benefit to CIMSPA's achievement of its vision, mission and strategic objectives if the offer is accepted, it does not prevent CIMSPA operating for the benefit of the public if accepted, and the offer is in the best interest of the institute.

## **Declaring Gifts and Hospitality**

It is the responsibility of CIMSPA's People to ensure that they declare all offers of gifts or hospitality that arise as a result of their affiliation with CIMSPA. In the event that an offer of gifts or hospitality is received by CIMSPA's People as a result of another connection but has the potential to influence their affiliation with CIMSPA, this must also be disclosed.

All CIMSPA's People will have access to the [Declaration of Gifts and Hospitality Form](#). This will collect the following information:

- Name
- Role at CIMSPA
- Details on the gift or hospitality offered
- Who the gift or hospitality offer is from
- The value of the gift or hospitality offer
- The date the gift or hospitality was offered
- Whether the offer was accepted or declined
- If the offer was accepted was this for personal gain or shared benefit

The Register is a live register and therefore CIMSPA's People must submit their declaration as soon as an offer of gifts or hospitality is received.

## **Monitoring of the Register**

The Register of Gifts and Hospitality will be monitored and reviewed by the Chief Operating Officer. Details of the register will also be accessible by the following individuals:

- Chair of CIMSPA's Board
- CIMSPA's Board of trustees
- CIMSPA's CEO
- CIMSPA's Chief Strategy Officer
- CIMSPA's Chief Operating Officer



- CIMSPA's Head of Governance and Compliance
- CIMSPA's Governance Manager

The register will be maintained in line with the financial calendar and reported by the Chief Operating Officer to the senior leadership team quarterly and the external auditors by the Chief Operating Officer annually.

## Receipt of Products / Services for Testing

CIMSPA enters into partnership with a carefully curated range of suppliers (Supplier Partners), who provide exclusive offers and discounts to CIMSPA members. In order to assess whether an organisation's products or services meet our strict quality assurance requirements, CIMSPA may request access to them in order to test them.

Additionally, when CIMSPA is considering using a supplier to provide products or services for CIMSPA's use, again CIMSPA may request access to those products or services in order to test them.

Where this occurs and a member of CIMSPA staff receives access to a product or service, CIMSPA does not classify this as Gifts or Hospitality, and therefore this falls outside of the remit of the rest of this Policy. However, for the purposes of transparency, this will be dealt with in the following way:

- It must be made clear to suppliers that receipt of products or services for testing is not a guarantee of a favourable outcome for the supplier
- Where a supplier requests that a product is returned after testing, CIMSPA will always comply within the required timeframe
- Where a supplier does not request that a product is returned after testing, or where free access to a service will be provided beyond the period of testing, this must be recorded on the [Supplier Testing Register](#) if the value of the product or service is £10 or more.
- Following testing, any products or services which are retained and have a value of less than £10 can be kept by the staff member who carried out the testing
- Following testing, any products or services which are retained and have a value of £10 or more will be distributed as follows:
  - Any products which are in a poor or unusable condition after testing will be disposed of
  - Any products which are unsuitable for use by another individual for hygiene reasons or for any other appropriate reason can be retained by the staff member who carried out the testing
  - Any single-user products or services can be retained by the staff member who carried out the testing (e.g. access to an app which is via a personal login)
  - All other products / services will be distributed across the staff team in a way which is fair, for example via a draw or similar.



# Failure to Comply

In the event that CIMSPA's People fail to comply with the conditions outlined in this policy, CIMSPA reserves the right to conduct disciplinary investigations relating to conduct and impose sanctions as a result. Further information on disciplinary proceedings and outcomes can be found in the CIMSPA employee handbook.

## Review

The Declaration of Gifts and Hospitality Policy will be reviewed in July 2026 unless a change in policy, governance or other circumstance requires a review prior to this date. It will then be reviewed biennially.



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