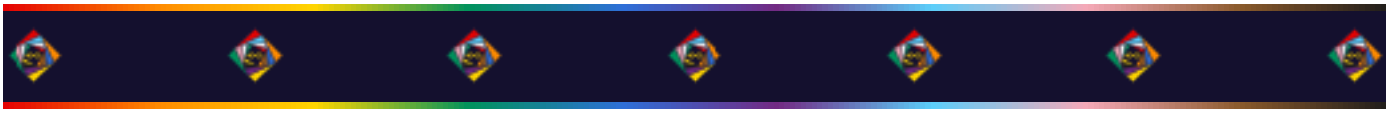
THE GLITTER STANDARD · DOCUMENT

Policy Pack

Anti-bribery, sponsorship, equality for our own people, safeguarding, whistleblowing and financial controls.

Version 1.1 · September 2026 · Download as PDF · All documents · Large print, plain text or Word on request from hello@theglitterstandard.co.uk

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Six short policies every organisation of our kind should have: anti-bribery, sponsorship and gifts, equality and inclusion for our own people, safeguarding and lone working, whistleblowing, and financial controls. Plain, standard and proportionate to our size.

1. Anti-bribery and corruption

Required in practice by the Bribery Act 2010: an organisation is guilty of an offence if someone acting for it bribes another person, unless it has adequate procedures in place. This policy is those procedures, sized to us.

What we will not do

- We do not offer, give, ask for or accept anything of value to influence a decision about an accreditation, a visit, a complaint, a delisting, a partnership or a purchase.
- No payment, gift, hospitality, donation, sponsorship, favour or job offer changes whether a venue gets or keeps the badge. Ever.
- Facilitation payments are bribes and we do not make them.

Gifts and hospitality

- Anything worth more than **£50** offered to a director, an Ambassador or anyone working for us must be declined, or if declining would cause offence, accepted and declared within seven days.
- An Ambassador never accepts free drinks, entry, food or anything else from a venue. If it is offered, pay for it and note it in the report.
- A gifts and hospitality register is kept and reviewed at every board meeting.

If you suspect bribery

Tell a director, or use the whistleblowing route in policy 5. Nobody is penalised for raising a concern honestly, even if it turns out to be mistaken. We will investigate and, where there is evidence of a criminal offence, report it to the police.

Adopted by the board on _____. Review: annually, and whenever the law or our circumstances change.

2. Sponsorship, funding and gifts to the organisation

Money from sponsors and funders pays for training and visits. It never buys an outcome, and this policy is how we keep that true.

- **A sponsor funds places, never outcomes.** A sponsored venue is trained, checked and visited exactly as a paying one, and is never told apart on the map.
- **No sponsor, funder or partner** has any say over the Ten, the Testing Protocol, the training, who is accredited, who is visited or who is delisted. Those belong to the Standards Council and the board.
- **No single sponsor** provides more than 40% of our income from our second year onwards.
- **We will not take money from** anyone whose business or conduct is incompatible with what we exist for, including anyone who has been found to have discriminated and has not put it right. The board decides, and records why.
- **Alcohol sponsorship** is accepted only where the materials comply with the Portman Group code, and never where a sponsor's branding would appear on material aimed at under-18s.

- **Every sponsor and funder is named publicly**, with what they funded. Acknowledgement is a line of text, never a logo inside the Seal.
- **Any sponsor may be refused or ended** by the board at any time if continuing would damage confidence in the badge.

Adopted by the board on _____. Review: annually, and whenever the law or our circumstances change.

3. Equality, diversity and inclusion: our own people

We ask venues to welcome everyone. This is how we hold ourselves to the same thing, for directors, founders, Ambassadors, Standards Council members, contractors and anyone we ever employ.

- We do not discriminate against, harass or victimise anyone because of age, disability, gender reassignment, marriage or civil partnership, pregnancy or maternity, race, religion or belief, sex or sexual orientation, or because of their background, caring responsibilities or class.
- **Adjustments are made on request, without proof.** Nobody working with us is asked for a diagnosis or a document before we do something that helps them take part.
- **Meetings and papers are accessible**: plain English, sent a week ahead, captions on, any format on request, and a written contribution carries the same weight as attending.
- **We recruit openly** for Ambassadors, Standards Council seats and any paid role: published, no CV needed for lived-experience seats, and never filled by the founders alone.
- **At least two Standards Council seats** are held by people with lived experience who sit for themselves, and the Council owns what the badge means.
- **If someone working with us experiences discrimination**, from us, a venue or anyone else, they tell a director or use the whistleblowing route, and we act. Nothing that happened to a person is made public without their agreement.
- We publish who we are and how we are made up, in the annual report, once there are enough of us for that to mean anything without identifying individuals.

Adopted by the board on _____. Review: annually, and whenever the law or our circumstances change.

4. Safeguarding and lone working

We do not work with children, and our work does not involve regulated activity, so no DBS checks are required or taken. But Ambassadors go out at night in licensed premises and will sometimes meet people who are vulnerable or at risk. This policy is about them and about the people they meet.

Ambassadors

- **Always in pairs**, never alone, on every visit.
- **A duty contact is on the phone** for the whole of every visiting night, and everyone has the number.
- **Anyone may stop at any moment**, for any reason, with expenses still paid.
- **If a venue or a street feels unsafe, leave together, straight away.** The visit ends and that is always the right decision.
- **Travel home is paid**, and a taxi is paid at any hour if someone would rather not walk or wait.
- **Nobody under 18 is an Ambassador.**
- **A call the next day** after any night that went badly.

If an Ambassador sees someone at risk

- If someone is in immediate danger, call 999. Being a guest comes before being an Ambassador.
- Tell venue staff, who are trained to respond and whose venue it is.
- Stay with the person if it is safe and they want you to, until staff or help arrives.
- Tell the duty contact that night, and write it in the report separately from the venue's assessment.
- We pass a concern about a person to the police or the local safeguarding team where there is a risk of serious harm, with the person's consent wherever possible and without it where the risk is immediate.

Disclosures

If someone tells an Ambassador or a director that they have been harmed: listen, do not promise confidentiality you cannot keep, do not investigate, write down what was said in their words as soon as possible, and tell a director the same night. The person decides what happens next unless there is a risk of serious harm to them or someone else.

Adopted by the board on _____. Review: annually, and whenever the law or our circumstances change.

5. Whistleblowing

A route to raise something serious about how The Glitter Standard itself behaves, for directors, founders, Ambassadors, Council members, contractors, venues and anyone else. Protected disclosures are covered by the Public Interest Disclosure Act 1998.

What this is for

- A badge awarded, kept or removed for the wrong reason.
- A breach of the firewall between The Glitter Standard and Glitterbomb Events.
- A payment to a founder or a connected company outside the published rules.
- Evidence, visit reports or published figures that are not true.
- Bribery, fraud, a danger to someone's health or safety, a breach of the law, or covering any of those up.

How to raise it

- To the **independent chair**, whose email is published on the governance page. Until one is appointed, to either founder, or anonymously through the complaints form on the website.
- You can raise it anonymously. We will still act, though we may not be able to come back to you.
- If it concerns a founder or a director, it goes to the independent chair, and the person concerned takes no part in it.

What we do

- Acknowledge within five working days where we have a way to reach you.
- Decide who investigates: never someone involved in what is being raised.
- Report the outcome to the board, and to you where we can.
- Record it, and report the number of disclosures and outcomes in the annual report.

Nobody is penalised for raising a concern honestly. An Ambassador does not lose their place, a venue does not lose its badge and a partner does not lose its agreement because someone raised something. If you are not satisfied with how we handle it, you can go to the CIC Regulator, the ICO or the police, and we will say so rather than ask you not to.

Adopted by the board on _____. Review: annually, and whenever the law or our circumstances change.

6. Financial controls

Small organisation, simple rules, proportionate to our size and to the fact that both founders are connected with companies the CIC may one day pay.

RULE	DETAIL
Two signatories	Any payment above £500 needs two directors to approve it. Below that, one, with the other able to see every transaction.
No cash	Everything through the bank account. No petty cash, no personal cards, no reimbursement without a receipt.
Founder pay	Set by the independent chair alone under the published remuneration policy, with both founders' interests declared and minuted. Published in the annual report in figures.
Related parties	Any contract with a company connected with a founder is benchmarked by the chair against a third-party quote, approved with the connected founder

RULE	DETAIL
	abstaining, minuted, and listed in the annual report by amount and description. Never more than half of the CIC's spending in a year.
Income	Venue fees are invoiced from the platform and paid to the bank account. No fee is ever taken in cash or in kind.
Budget	The board agrees a budget each year before the financial year starts and reviews actual against it at every board meeting.
Reserves	We aim to hold three months of running costs before any founder pay is drawn, and six months before any surplus is applied, and we say in the annual report if we do not.
Surplus	Beyond reserves, surplus goes to lower accreditation prices, free places for small independent venues, the Ambassador fund and new sectors. Reviewed by the chair annually and reported.
Reconciliation	The bank account is reconciled monthly and the statement seen by both directors.
Expenses	Agreed in advance, claimed with receipts within thirty days, paid within ten working days. Nobody approves their own expenses.
Accounts	Prepared by an accountant, filed on time, published with the CIC34 report.
Fraud	Any suspicion goes to the independent chair and, where there is evidence of an offence, to the police.

Adopted by the board on _____. Review: annually, and whenever the law or our circumstances change.