

Gifts and Hospitality Policy



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Introduction

This policy has been developed to ensure that staff, trustees and governors understand the Trust's requirements on gifts and hospitality, including what is and is not acceptable, and what actions to be taken in the event of a gift being offered.

The Trust expects staff, trustees and governors to exercise the utmost discretion in accepting gifts and hospitality as this can potentially damage the Trust's reputation and lead to allegations of bribery and corruption.

This policy seeks to protect staff from suspicion of dishonesty or conflict of interest.

Key Principles

Employees shall not use their authority or position for personal gain and shall seek to uphold the reputation of the Trust by:

- maintaining an irreproachable standard of honesty and integrity in all their business relationships;
- complying with the letter and spirit of the law and contractual obligations, rejecting any business practice that might be deemed improper;
- maintaining the interests and good reputation of Waterton Academy Trust, at all times in their business relationships and transactions;
- not making use of their official position to further their private interests or those of others; and
- reporting gifts with a value of over £25 to the COFO within 10 days of receipt, with details of the item and the source of the gift, as well as any additional context which may be relevant. A Declaration form must be completed, see **Appendix 1**

Any employee who becomes aware of a breach of policy must refer to the Whistleblowing Policy, and report this immediately to his or her line manager who will instigate investigations as necessary.

The COFO will ensure that all reportable gifts are logged on the Trust Gifts and Hospitality register, see Appendix 2

Gifts

Particular care should be taken about a gift from a person or organisation that has, or is hoping to have, a contract with the trust or individual academy. This policy does not prohibit normal and appropriate hospitality (given and received) to or from third parties, however, staff, trustees and governors should be aware that the receipt of gifts or excessive hospitality may compromise you or more seriously lead to prosecutions for corruption.

It is common for suppliers and other contacts to share small gifts with schools or with the Trust central team. Gifts of low intrinsic value such as promotional

calendars or diaries, chocolates and branded stationery or small tokens of gratitude including gifts from pupils, parents and guardians can be accepted. These gifts may be items such as routinely sent out at Christmas or the end of term. We must take a sensible approach to items of low value and understand that these are well-intentioned and not offered to influence individuals or schools

There is therefore no requirement to record details of any gift or hospitality offer with a value of less than £25.

The Trust acknowledges that there are situations when refusing to accept a gift or returning it could cause offence and potentially damage a business relationship. For this reason, colleagues must follow the Key Principles detailed above.

There are some gifts which should never be accepted or given by colleagues:

- Cash or gifts that are readily convertible into cash as they may be construed as bribes;
- Cash, cheques or transfer of funds to the account of the individual or of a family member, partner or friends;
- Offers of services for free or at a discount, such as holiday villas and;
- Any other gifts or services where it is clear, or someone else could reasonably assume, that the offer is intended to influence the individual colleague's judgement in favour of the donor.

Where any such gifts are offered colleagues must inform the COFO immediately.

It should be noted that prizes given for raffles do not need to be recorded as the beneficiary is clearly the prize winner.

The Trust may on occasion share small gifts with schools, such as chocolates at Christmas or after an Ofsted inspection. Gifts for individual employees such as wedding, birthday or get-well-soon gifts cannot be funded through school funds.

Staff may accept gifts from parents and students in the form of token items which are commonly given as a 'thank you' at the end of term. Any items over the value of £25 should be reported to the COFO. In the interests of safeguarding children, and to prevent staff from being open to accusation of exerting undue influence, no member of staff is permitted to give a gift to a pupil at any time unless this "gift" relates to a pre-approved award scheme, approved by the Trust/School Leadership Team.

Hospitality

The Trust acknowledge that hospitality is often recognised as forming part of establishing and strengthening business relationships. However, a conflict of

interest could arise if, for example, a colleague is offered hospitality, particularly very generous hospitality during negotiations of business terms. Colleagues should ensure that they follow the Key Principles when offering or accepting hospitality and should discuss any concerns with the COFO.

Offers to attend purely social or sporting functions must only be accepted when these are part of the life of the community or where the Trust and/or academy should be seen to be represented. If accepted on this basis, the same must be properly authorised and recorded by the COFO.

Appropriateness


Appropriateness can depend on what is the norm for a particular business area - what is a normal activity for one kind of business area could be seen as unusual and a cause for concern in a different circumstance.

As a rule, hospitality received and offered must be of an appropriate nature; must not be over-generous; and should be proportionate to the purpose for which it is offered. For example, a supplier providing a buffet lunch as part of a full day meeting is appropriate; a supplier funding an evening meal and open bar shortly before a contract renewal is not. It is important that any hospitality does not give rise to conflicts of interest and so colleagues should advise the COFO of all hospitality events they are invited to.

Appropriateness should also be considered in the Trust's own hospitality offer. For full day meetings, generally a lunch will be provided. The use of school catering services is generally good practice, but value for money should be considered and alternative options sourced as necessary. For regular internal training sessions, it may be more appropriate to advise staff to bring a lunch. The Trust will not fund staff Christmas or end of term parties or alcoholic drinks, as this is not a permitted use of public funds.

All the policies, procedures and guidelines written are not a substitute for common sense, and if necessary, the COFO can offer advice on the appropriateness of the hospitality offered or received.

Failure to comply with this policy may result in disciplinary procedures been followed.

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Version	Date	Author	Change/Reference
1	October 22	P Knox	New policy
2	February 2023	P Knox	
3	February 2025	P Knox	No major changes, few words & order amendments

Appendix 1

Declaration of Gifts and Hospitality Offered

Please complete this form in relation to any gifts or offers of hospitality received to the value of £25 or over. Any person connected to the Trust who is offered a relevant gift should read the gifts and hospitality policy before completing and returning to the COFO.

pknox@watertonacademytrust.org

Name	
Position	
School of Employment	
Date of offer received	
Details of gift/hospitality	
Source of offer	
If gift is accepted how will it be used e.g. personal use, shared with colleagues, donated to charity etc.	
Is the individual/ company/ organisation dealing with you or the Academy in relation to any Academy business, if so, please give details	
Are they providing goods/ services to the Academy or hope to do so in future?	
I certify that I have read the gifts and hospitality policy and to the best of my knowledge I have complied with the guidance	
Signature	Date

