



W A T E R T O N
ACADEMY TRUST®



Gifts and Hospitality Policy

1. Introduction

This policy has been developed to ensure that staff and Governors have an understanding of the Trust's ruling 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 receipt of gifts and hospitality can damage the Trust's reputation and potentially lead to allegations of bribery and corruption.

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

2. Key Principles

Employees shall not use their authority or office for personal gain and shall seek to uphold and enhance the standing of Waterton Academy Trust by:

- Maintaining an unimpeachable 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
- At all times in their business relationships acting to maintain the interests and good reputation of Waterton Academy Trust.
- Staff must not make use of their official position to further their private interests or those of others.
- Reporting gifts with a value of over £25 to the CFO 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 **(Declaration form to be completed, see Appendix 1)**

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

The CFO will ensure that all reportable gifts are logged on the Trust Gifts and Hospitality register **(Appendix 2)**.

3. Gifts

As a general rule colleagues (or family members or friends) should not accept any gift (whether in cash or in kind) from a potential service provider or other business contact or in return offer any gifts. Accepting or exchanging gifts could compromise the reputation of the individual colleague and/or Waterton Academy Trust

It is common for suppliers and other contacts to share small gifts with schools or with the Trust central team. These gifts may be items such as chocolates and branded stationery 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.

Waterton Academy 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 CFO immediately.

It should be noted that prizes given for raffles should only be recorded when the Trust or school is the beneficiary of the raffle funds, or where the gift was NOT initially offered specifically as a raffle prize.

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 CFO. Staff must not give personal gifts to individual pupils. Any reward given to a pupil must be consistent with the Trust’s/academy’s behaviour policy, recorded and not based on favouritism.

4. Hospitality

Waterton Academy Trust acknowledge that hospitality is recognised as often forming part of the process 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 the course of 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 CFO.

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 CFO.

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 general 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 appropriate.

It is important that any hospitality does not give rise to conflicts of interest and so colleagues should advise the CFO of all hospitality events they are invited to.

Similarly, a particular location (for example, a distant town/city) might be appropriate for some circumstances (for example, dinner following a training seminar or business meeting), but inappropriate without the business connection.

Appropriateness should also be considered in the Trust’s own hospitality offer. For full day meetings, a lunch should generally be provided. Local sandwich shops delivering a lunch or buffet, or the use of school catering services is generally good practice. Value for money should be considered. For regular internal training



sessions, it may be more appropriate to advise staff to bring a lunch. The Trust should not fund alcoholic drinks. Staff Christmas and end of term parties cannot be funded through school funds.

To help you to judge the appropriateness of the hospitality offered or received contact the CFO.

All the policies, procedures and guidelines written are not substitute for common sense.

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

Document Detail			
Document Name		Gifts and Hospitality Policy	
Version		2	
Effective from:		February 2023	
Approved by:		Trust Board	
Approval meeting reference:		7 th November 2023	
Next Review Date:		November 2024	
Chief Officer Signature:		P Knox, COFO	
Version Control			
Version	Date	Author	Change /Reference
1	October 22	P Knox	New policy
2	February 2023	P Knox	



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 CFO, 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



Appendix 2

Gifts and Hospitality Register

Financial year:					
Nature of gift/hospitality	Source of offer	Approx. value	Date of offer	Contextual information	CFO Approval to accept?

