



Westcountry Schools Trust (WeST)

## Gifts and Hospitality Policy

Person(s) responsible for updating the policy:	WeST, Executive Leadership Team
Date Approved:	18 July 2022 (future Trust Board date)
Date of next review:	July 2024
Status:	Non-statutory guidance
Published on	WeST website School websites

Committee:	Finance Committee
Approved on:	05.07.22
Review Cycle	2 years
Next review date:	July 2024

Associated documentation	
Academies Handbook 2021	2021 edition
Anti-Fraud and Corruption Policy	July 2022
Financial Regulations Manual	September 2021
Conflicts of Interest and Related Party Transactions Policy	July 2022
HR Code of Conduct	September 2019

### Mission Statement

WeST holds a deep-seated belief in education and lifelong learning. Effective collaboration, mutual support and professional challenge will underpin our quest to ensure that all of the children and adults we serve are given every opportunity to fulfil their potential and succeed in life.

Westcountry Schools' Trust adopted this policy in July 2022.

Westcountry Schools' Trust will review this policy bi-annually or when the need arises

# Policy Statement

1. As a general guideline, business gifts and hospitality should not be accepted by any member of staff, except as provided for below. This ensures the Trust demonstrates propriety and regularity in the use of public funds.
2. The intention of the policy is to ensure that the Trust can demonstrate that no undue influence has been applied or could be said to have been applied by any supplier or anyone else dealing with the Trust. The Trust should be able to show that all decisions are reached on the basis of value for money and for no other reason. Any consideration of whether or not the principles of this policy have been breached will be determined by reference to this provision. The policy also aims to comply with the Academies Handbook (AH), which states:

'The academy trust should have a policy and register on the acceptance of gifts, hospitality, awards, prizes or other benefits that might compromise their judgment or integrity and should ensure all staff are aware of it. When making gifts, the trust must ensure the value is reasonable, is within its scheme of delegation, the decision is documented, and achieves propriety and regularity in the use of public funds.'

3. Employees shall not use their authority or office for personal gain and shall seek to uphold and enhance the standing of the 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; and
  - at all times in their business relationships acting to maintain the interests and good reputation of the Trust.
4. Any employee who becomes aware of a breach of policy must report this immediately to his or her manager who will instigate investigations, as necessary via the Headteacher/Principal or the Trust's Chief Financial Officer ('CFO').
5. Any personal interest that may impinge or might reasonably be deemed by others to impinge on an employee's impartiality or conflict with the duty owed to the Trust in any matter relevant to an employee's duties (such as conflicting business interests) should be declared in writing. Any member of staff who is aware of any business

dealings conferring personal gain or involving relatives or associates of members of staff must supply details of such transactions for entry into the Register of Business Interests in accordance with the Trust's Conflicts of Interest and Related Party Transactions policy.

6. Employees are permitted to accept gifts, rewards, or benefits from members of the public or organisations the Trust has official contacts with only where they are isolated gifts of a trivial character (such as diaries or calendars) or 'one-off' token gifts from parents. Gifts should not therefore be accepted if they appear to be disproportionately generous or could be construed as an inducement to affect a business decision. Personal gifts from employees to pupils are inappropriate and could be misinterpreted and may lead to disciplinary action.
7. The following general rules apply and must guide decisions on receipt of gifts and hospitality as an employee of the Trust:
  - to accept gifts should be the exception. An employee may accept small 'thank you' gifts of a reasonable value, such as a diary, a coffee mug or bunch of flowers, not over £25 in value. The employee should notify the School Business Accountant of any gift or hospitality over this value for entry in the Gifts Register;
  - an employee should always say "no" if he/she thinks the giver has an ulterior motive. They should be sensitive to the possibility that the giver may think that even small gifts or simple hospitality will elicit a more prompt service or preferential treatment;
  - an employee should never accept a gift or hospitality from anyone who is, or may be in the foreseeable future, tendering for any contract with the Trust, seeking employment with the Trust or is in dispute with the Trust, even if the employee not directly involved in that service area;
  - where items purchased for the Trust include a 'free gift', such a gift should either be used for Trust business or handed to the School Business Accountant or Headteacher/Principal to be used for charity raffles; and
  - if an employee is in doubt about the acceptability of any gift or offer of hospitality, it is his/her responsibility to consult the School Business Accountant, Headteacher/Principal or the Trust's CFO.
8. A gauge of what is acceptable in terms of hospitality is whether Westcountry Schools Trust would offer a similar level of hospitality in similar circumstances. In general:
  - occasional working lunches with customers, providers or other agencies are generally

acceptable as a way of doing business, provided they are not to an unreasonable level or cost;

- invitations to corporate hospitality events must each be judged on their merit. Provided the general rules have been considered, it may be acceptable to join other company / organisation guests at:
  - sponsored cultural and sporting events, or other public performances, as a representative of the Trust; or
  - special events or celebrations.

However, employees should consider the number of these events, and always take into consideration what public perception is likely to be if it was known the employee/s were attending;

- acceptability depends on the appropriateness of the invitations, in terms of the level of hospitality, the frequency and the status of the invited employee. In all such cases the academy's Headteacher/Principal or CFO must be consulted;
- paid holidays or concessionary travel rates are not acceptable. Neither are offers of hotel accommodation nor the use of company villas/apartments;
- if an employee is visiting a company to view equipment that the Trust is considering buying, he/she should ensure that the expenses of the trip are paid by the Trust. Acceptance of refreshments and/or a working lunch may be acceptable, but care must be taken to ensure that the Trust's purchasing and/or tender procedures are not compromised;
- acceptance of sponsored hospitality that is built into the official programme of conferences and seminars related to an employee's work are acceptable;
- offers to speak at corporate dinners and social gatherings, or events organised by, for example, a professional body, where there is a genuine need to impart information or represent the Trust must be agreed in advance with a Headteacher/Principal or the Chief Executive Officer. Where an employee's spouse or partner is included in the invitation, and approval has been given for him/her to attend, it will be acceptable for the spouse or partner to attend as well, but if expenses are incurred, these must be met personally; and
- any invitation an employee accepts should be made to him/her in their professional/working capacity as a representative of the Trust.

9. This policy will be reviewed by Finance Committee on a 2-year cycle.

## Adoption of the Policy

This Policy has been adopted by the Trustees of the Westcountry Schools Trust.

Signed

*Iain Grafton*

Chair of Trust

Trust Board meeting date: 18.07.2022

## POLICY HISTORY

Policy / Version Date	Summary of change	Contact	Implementation Date	Review Date
June 2022	New policy	CFO	July 2022	July 2024