

Woodland Academy Trust  
Acceptance of Gifts and Hospitality Policy

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Woodland Academy Trust is committed to inclusion, diversity and promoting equal opportunity for all. All schools within the Trust share this commitment, providing an inclusive environment.

This objective applies to all policies and procedures and the Trust will at all times adhere to the requirements of the Equalities Act 2010 and any other associated guidance.

Public money must always be spent prudently and in a manner that commands broad public support. There are times when staff, in their capacity as employees of the Academy, will be offered or wish to offer gifts

and hospitality. This policy sets out guidance on acceptable boundaries on the giving and receipt of hospitality or gifts.

The term 'gifts' is deemed to include:

- Goods provided for personal or other private use.
- Personal services.
- Loans of equipment, vehicles etc for personal use.
- The provision of goods and/or services at preferential cost (including loans of money) for personal or other private use.

The term 'hospitality' is deemed to include the offer or receipt of:

- Food and drink.
- Travel.
- Accommodation.
- Entertainment.

## **1. Legal Framework & National Guidance**

### *Prevention of Corruption in the Public Sector*

Under the Prevention of Corruption Acts, 1906 and 1916, it is an offence for employees corruptly to accept any gifts or consideration as an inducement or reward for:

- Doing, or refraining from doing, anything in their official capacity; or
- Showing favour or disfavour to any person in their official capacity.

Under the 1916 Act, any money, gift or consideration received by an employee in public service from a person or organisation holding or seeking to obtain a contract will be deemed to have been received corruptly unless the employee proves to the contrary.

## **2. General Principles**

The Academy is responsible for ensuring the guidelines are brought to the attention of all employees, and that a framework is put in place to ensure they are effectively implemented.

It is the responsibility of staff to ensure that they are not placed in a position which risks, or appears to risk, conflict between their private interests and their duties at the Academy. This applies to both staff who commit resources directly (e.g. the ordering of goods or services) or indirectly (e.g. by policy development).

The provisions set out in this policy shall be held to apply to all staff members. There is no seniority threshold. In cases of doubt, individuals should clear acceptance of gifts or hospitality with the Chief Finance Officer (CFO).

Each employee has a personal responsibility to declare hospitality and gifts in accordance with the policy. Non-compliance with the policy may lead to disciplinary action. Staff also need to be aware that a breach of the provisions under legislation may make them liable to prosecution and may also lead to loss of employment and pension rights.

Any hospitality or gifts accepted with a value in excess of £25 should be entered on a Gifts and Hospitality Register maintained within the school office. It should be noted that this Register is not a confidential document and should be made available to interested parties, including but not limited to the Academy auditors, on request.

### **3. Receipt of Hospitality**

#### *Acceptable Hospitality*

Modest hospitality is an accepted courtesy of a business relationship. However, the recipient should not allow themselves to reach a position whereby he or she might be deemed by others to have been influenced in making a business decision as a consequence of accepting such hospitality.

The frequency and scale of hospitality accepted should not be significantly greater than the recipient's employer would be likely to provide in return.

Any hospitality accepted of a value exceeding £25 per item should be recorded on the register.

#### *Unacceptable Hospitality*

Any hospitality which does not fulfil the criteria described for acceptable hospitality will be unacceptable. Where this is not easy to decide, the offer should be declined or advice sought from the CFO. Any hospitality offered to Academy employees by external parties whether accepted or declined should be recorded in the register.

#### *Commercial Sponsorship*

As a general principle, all offers of hospitality received from commercial third parties should be refused. Attendance at relevant commercially sponsored conferences and courses is acceptable but only where acceptance will not, and cannot be seen as compromising purchasing or other decisions in any way. Receipt or provision of such sponsorship should be recorded in the register.

Employees should pay particular attention to the circumstances in which hospitality is offered: the provision of hospitality by an individual or organisation during a tendering process or where a contract is shortly to end, or where performance of the contract is in question, or in any other circumstances where acceptance might compromise the position of the employee or of the Academy, is not acceptable.

### **4. Provision of Hospitality**

The provision of hospitality by employees of the Academy to representatives of other organisations should be modest and appropriate to the circumstances.

Provision of hospitality by the Academy to employees or others is appropriate in the case of working lunches in the course of meetings or workshops.

The use of the Academy monies for hospitality and entertainment at conferences and seminars should be carefully considered. The Academy needs to be able to demonstrate good value in incurring public expenditure.

Note that where individuals have accepted hospitality from another organisation, for example, in order to fulfil a speaking engagement this should be of a value equivalent to that normally provided by the Academy and there is no further entitlement to claim expenses from the Academy.

Hospitality must be secondary to the purpose of any meeting and the level must be appropriate and in proportion to the event. The costs involved must not exceed the level which the recipients would normally adopt when paying for themselves at such an event or that which could be reciprocated by the Academy.

## **5. Wellbeing activities and hospitality**

The Trust Chief Executive Officer (CEO) may authorise expenditure for staff events and hospitality to be funded from unrestricted funds on an exceptional basis for the following purposes:

- Well-being and staff retention.
- Recognition of staff out of hours services to support SATS rapid improvement programmes.

Expenditure may include the provision of overnight stay, hire of premises, meals and refreshments but will exclude alcohol.

Costs will be assessed for both affordability and value for money and approved by both the CEO and CFOO prior to any booking being made

## **6. Business – gifts**

### *Acceptance of gifts*

Employees should not accept gifts which may be or be capable of, being construed as being able to influence a purchasing decision or cast doubt on the integrity of such decisions.

Personal gifts offered by parents/carers and students to members of staff, for example, at holiday or end of term times, should be recorded on the Gifts and Hospitality Register if the estimated value is in excess of £25.

In certain instances, for example, where a class contributes collectively, gifts greater than a value of £25 up to a maximum value of £100 may be accepted, but must be recorded on the Gifts and Hospitality Register.

Where it is difficult to decide whether a gift should be accepted or not, advice should be sought from the Business Manager.

Commercial or corporate business gifts and donations made to the Academy, other than items of very small intrinsic value, should be reported separately to the Business Manager and added to the register.

Presents and donations to the Academy or a Department should be reported and added to the register. It is at the discretion of individual members of the Senior Leadership Team as to whether or not the gift may be kept by an individual.

All gifts or hospitality received valued at over £25 shall be acknowledged in writing and a copy of that acknowledgement shall be forwarded to and be held on file by the Finance Department.

### *Giving of gifts*

On occasion the Head and governors may purchase gifts for individuals or a group of staff to recognise their response to an event. This could include occasions when the cost of that gift is less than the money that would have been spent on an alternative arrangement.

Suitable gifts could be flowers or a store voucher. This will be no more than £50 per person unless approval has been sought from the Chair of Governance.

## *Monetary gifts or charitable donations.*

The acceptance or giving of cash is not acceptable. Charitable donations should not be given by any member of staff, on behalf of the Academy.

### **7. Records of Hospitality and Gifts**

All gifts and hospitality with an estimated value of over £25 must be recorded on the Gifts and Hospitality Register. When in doubt, employees are advised to record any matters concerning gifts and hospitality which may be covered by this policy to ensure that an individual does not expose themselves to risk.

The information required for the hospitality and gifts register is:

- Date of entry.
- Name of the recipient.
- Description of gift/hospitality and approximate value.
- Name of the provider.
- Whether it was accepted/rejected.
- The name of who approved it.

Submissions should be made as soon as is practically possible and no later than one week following the date of receipt.

If employees have any doubt about whether an item should or should not be recorded, they are advised to record it.

### **8. Links with other policies**

This gifts and hospitality policy is linked to the:

- Staff Code of Conduct
- Staff Disciplinary Procedures
- Accounting Policy

## **9. Appendices**

### **Appendix 1: gifts and hospitality register**

<b>Date</b>	<b>Name of person receiving gift/hospitality</b>	<b>Description of gift/hospitality and approximate value</b>	<b>Party offering gift/hospitality</b>	<b>Accepted/rejected</b>	<b>Approved by</b>
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