



Gifts and Hospitality Policy

This policy is applicable to the Wonder Learning Partnership (WLP)

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Background

The Wonder Learning Partnership is committed to the highest level of integrity, honesty and accountability in all its business dealings. All staff, trustees, and governors are expected to maintain high standards of propriety and professionalism in all their dealings, ensuring they are free from any conflict of interest through their business in the name of the Academy Trust.

In order to protect all individuals associated with the Trust, and the reputation of the Trust and its academies from accusations of bribery or corruption, staff, trustees, and governors must take extreme care that none of their dealings, directly or indirectly, could be deemed as a reward or benefit, in line with the Prevention of Fraud and Bribery Act 2010. This Act makes it a criminal offence to:

- Offer, promise or give a bribe.
- Request, agree to or accept a bribe.
- (For an organisation) fail to prevent bribery by those acting on its behalf ('associated persons') to obtain or retain business or a business advantage for the organisation.

Under this Act, a bribe is 'a financial or other advantage' offered, promised or given to induce a person to perform a relevant function or activity improperly or reward them for doing so.

The Trust and each academy will hold a Gifts and Hospitality Register. All gifts/hospitality over the value of £20 must be recorded in the Gifts and Hospitality Register.

Definitions

A gift is any item or service, award, prize or any other benefit which is received free of charge; or personally offered at a discounted rate or on terms not available to the general public or which might be seen to compromise the personal judgement or integrity of the recipient.

Hospitality is the offer of food, drink, accommodation, entertainment or the opportunity to attend any cultural or sporting event not available to the general public without incurring a cost.

Dealing with Gifts and Hospitality

The Trust expects staff, trustees and governors to exercise the utmost discretion in giving and accepting gifts and hospitality when on Trust or academy business. Particular care should be taken about a gift from a person or organisation that has, or is hoping to have, a contract with our organisation. In any case of doubt, advice should be sought from the Trust CFO. Staff, trustees and governors must not make use of their official position to further their private interests or those of others.

Staff, trustees and governors must not accept gifts, hospitality or benefits of any kind from a third party where it might be perceived that their personal integrity is being compromised, or that the Trust/academy might be placed under an obligation.

Gifts of low intrinsic value such as promotional calendars or diaries, or small tokens of gratitude can be accepted. If there is any doubt as to whether the acceptance of such an item is appropriate,

individuals should decline the gift or refer the matter to the academy Head of Finance/People and Estates Lead.

It is common for appreciative parents and pupils to register their thanks for the work of staff in the form of a small personal gift. Individual gifts valued at less than £20 are perfectly acceptable without reference to senior members of staff. These will not need to be recorded in the register. Where gifts valued over £20 are accepted, these should be recorded in the register.

Where a more valuable gift, benefit or service is offered which is to the good of the academy, rather than an individual, it must be referred to the Head of Finance/People and Estates Lead or if in the case of the Head of Finance/People and Estates Lead, to the Headteacher for approval within their discretion; if acceptable, these items must be recorded in the register.

Hospitality such as working lunches, coffees etc. are perfectly acceptable where it is appropriate to offer or receive these in support of good relationships with visiting staff or business colleagues. Modest hospitality, provided it is reasonable in the circumstances, should be similar in scale of hospitality which the Trust as an employer would be likely to offer. These would not be added to the register. Hospitality received above this level should be recorded in the register.

If a member of staff, trustee or governor is offered a gift or hospitality whilst involved in the procurement of goods and services, tenders for work or when liaising with anyone conducting business with the school (other than light refreshments) it is their responsibility to discuss this with the CFO immediately.

If not accepting a gift would be regarded as causing offence, the item should be accepted. The matter should then be brought to the attention of the Head of Finance/People and Estates Lead as soon as possible who may decide to return the gift or may donate it to a school raffle or charitable cause.

Examples of gifts or hospitality that should not be accepted are cash or monetary gifts; gifts or hospitality offers to a member of your family; gifts or hospitality from a potential supplier or tenderer in the immediate period before tenders are invited or during the tender process; staff, trustee or governor attendance at sporting and cultural events at the invitation of suppliers, potential suppliers or consultants. (Where it is considered that there is a benefit to the Trust or one of its academies in a member of staff, trustee or governor attending a sponsored event, the attendance must be formally approved and registered by the Headteacher).

Where a gift is received on behalf of the school, the gift remains the property of the school. The gift may be required for departmental display or it may, with the Headteacher's approval, remain in the care of the recipient. Unless otherwise agreed, the gift should be returned to the Head of Finance/People and Estates Lead on or before the recipient's last working day.

Gifts are sometimes offered by suppliers with the purchase of items. All such special offer gifts are the property of the academy and must be used accordingly.

Giving Gifts and Hospitality

The Trust and its academies will not normally give gifts to other individuals or organisations. Any gift to an individual or organisation will only be made at the sole discretion of the Trust Board,

normally up to a maximum value of £50, and the decision must be fully documented in the Gift and Hospitality Register. This does not apply to the award of gifts, prizes, etc. related to the achievement of pupils, e.g. attainment or merit awards.

Where hospitality is provided by the Trust or its academies, this should be approved in advance by the Head of Finance/People and Estates Lead. In approving hospitality, the Head of Finance/People and Estates Lead should ensure it is not in breach of the UK Bribery Act 2010 and that the costs are appropriate for a publicly funded organisation. Hospitality such as working lunches, coffees etc. and modest hospitality in the form of meals etc. are perfectly acceptable where it is appropriate to offer or receive these in support of good relationships with visiting staff or business colleagues (but not family or friends). These would not be added to the register. Hospitality provided above this level should be recorded in the register.

Non-Compliance

In the case where it is believed that a member of staff, trustee, and governors has not declared a gift or hospitality, then a formal investigation will be instigated by the Trust COO. If misconduct is indicated, this may take the form of disciplinary procedures in the case of employees.



Wonder
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Wonder Learning Partnership – Gifts and Hospitality Register

Recipient	Nature of Gift/Hospitality	Donor	Date	Estimated value	Comments