

THE WOODARD ACADEMIES TRUST

POLICY ON GIFTS & HOSPITALITY

1. As a general guideline, business gifts and hospitality should not be accepted by any member of staff, except as provided for below. This policy applies to all staff at Woodard Academies Trust, whether working at individual schools or the Centre.
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 only 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 principle. If ever in doubt a polite but firm refusal is the right action.
3. Any breach of this policy could lead to disciplinary action and may constitute gross misconduct.
4. 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; at all times in their business relationships acting to maintain the interests and good reputation of the Trust.
5. 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.
6. 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 (see paragraph 9). 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 to the Finance Director for entry into the Register of Business Interests.
7. Employees are permitted to accept gifts, rewards or benefits from members of the public or organisations with which the Trust has official contacts only where they are isolated gifts of a trivial character, or inexpensive seasonal gifts (such as diaries or calendars). 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. A gift will be considered trivial if by virtue of its nature or branding it has no material commercial value, that is to say, no unrelated third party would reasonably be expected to purchase the item for a sum in excess of £20. Gifts of alcohol will not be considered to be trivial in any circumstances and should not be accepted.
8. In the school context, it is not unusual for parents to choose to 'join together' to purchase an end of year gift for a teacher. This practice is acceptable so long as the value of each individual contribution does not exceed £20.00
9. Where purchased items include a "free gift", such a gift should be either used for Trust business or handed to the Trust to be used at charity raffles, etc.

10. Conventional hospitality (lunches, outings, tickets for events, etc.) may be accepted provided that it is normal and reasonable in the circumstances. Such invitations should not therefore be accepted where there is no reasonable business justification for doing so, where an invitation is disproportionately generous, where the invitation could be seen as an inducement to affect a business decision, or where it might appear to improper.
11. Any hospitality other than of a nominal value (over £20) or facilities provided during the normal course of business should be reported to the Finance Director for entry into the Register of Business Interests.
12. The procedures contained in this policy cannot cover every situation that might arise and where it does not, you must seek and follow the advice of the Woodard Academies Trust Finance Director.

Adopted by Trustees	4 th July 2019
Review	July 2022