



West Norfolk
Academies Trust

GIFTS & HOSPITALITY POLICY

**Reviewed by: Finance & General
Purposes Committee**

Approved: March 2021

Next review date: March 2025

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1. Introduction

- 1.1** As a general guideline, business gifts and hospitality should not be accepted by any member of staff, except as provided for below.

2. Intention

- 2.1** 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.

3. Compliance

- 3.1** Any breach of this policy could lead to disciplinary action and may constitute gross misconduct.
- 3.2** 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.
- 3.3** 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 whistle blowing policy.
- 3.4** 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 Director of Finance for entry into the Register of Business Interests.
- 3.5** 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 effect a business decision.
- 3.6** Where purchased items include a "free gift", it should be the intention that the gift should be either used for Trust business or handed to the Trust to determine its alternate use (donation, charity event, etc.) via the Director of Finance.

3.7 In relation to conventional hospitality (lunches, outings, tickets for events, etc), this may be accepted provided that it is normal and reasonable in the circumstances. Such invitations should not 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.

3.8 Any hospitality other than of a nominal value (£25) or facilities provided during the normal course of business should be reported to the Director of Finance for entry into the Register of Business Interests.

4. Review

4.1 This policy shall be approved by the Finance Committee and reviewed on a regular basis