



# Gifts and Hospitality Policy

This policy has been adopted by all schools within  
The Golden Thread Alliance

Date Approved	Spring 2024
Date Reviewed	Spring 2025

## **1. Policy Statement**

**1.1** The purpose of this policy is to set out The Golden Thread Alliance (The Trust) and all colleagues, Local Governing Body (LGB) members' and Trustees' responsibilities in observing and upholding our position on fraud and bribery (including corruption) in order to protect colleagues, LGB members and The Golden Thread Alliance from suspicions of dishonesty and ensure that they are free from any conflict of interest with respect to the acceptance or provision of gifts, hospitality, or any other inducement from or to suppliers of goods or services to academies. It provides information and guidance to those working for us on how to recognise and deal with bribery and corruption issues.

**1.2** The Trust requires all colleagues, governors, trustees, and volunteers to always act honestly and with integrity to safeguard the public resources for which they are responsible. The Trust will not accept any level of fraud or bribery (including corruption). Consequently, any allegation will be thoroughly investigated and dealt with appropriately. The Trust is committed to ensuring that opportunities for fraud, bribery and corruption are reduced to the lowest possible level of risk.

**1.3** This policy has been agreed by the Board of Trustees.

## **2. Scope**

**2.1** This policy applies to all Trustees, Governors, and employees of The Golden Thread Alliance. The policy also applies to other individuals performing functions in relation to the Trust, such as agency workers, casual staff, volunteers, and contractors.

## **3. Hospitality**

**3.1** This policy does not prohibit the Trust's normal and appropriate hospitality (given and received) to or from Third Parties.

## **4. What is Permissible?**

**4.1** Gifts of low intrinsic value such as promotional calendars or diaries, or small tokens of gratitude including gifts from pupils, parents and carers can be accepted. If the value exceeds £30, approval of acceptance must be obtained from the individual's line manager.

**4.2** Colleagues are permitted to accept gifts from a whole class of pupils up to the value of £5 per pupil. These gifts do not need to be recorded in the Gifts and Hospitality Register. Gifts from a whole class of pupils which amount to more than £5 per pupil must be recorded in the Gifts and Hospitality Register once approval by the individual's line manager has been given that these can be accepted.

**4.3** Where approval is granted, any single gift or hospitality received with an equivalent value of £30 or over or whole class gifts received with an equivalent value of £5 per pupil or over must be recorded in the Register of Gifts and Hospitality (Appendix 1) kept within the Central Finance Office.

**4.4** In cases where a colleague receives a gift on behalf of The Trust/Academy, the gift remains the property of The Trust/Academy. The gift may be required for departmental display or it may, with the line manager's approval, remain in the care of the recipient. Unless otherwise agreed, the gift should be returned to the Department on or before the recipient's last working day.

**4.5** Modest hospitality, provided it is reasonable in the circumstances, for example, lunches while working visits, is acceptable.

**4.6** Colleague attendance at sporting and cultural events when paid for by suppliers, potential suppliers or consultants is **not** normally acceptable. Where it is considered that there is a benefit to the Academy in a member of staff attending a sponsored event, the attendance should be formally approved by Chief Executive Officer or Chief Operating Officer.

## **5. Prohibited Gifts**

**5.1** The Trust prohibits the accepting of gifts from, or the giving of gifts to, a third party in the following circumstances:

- It is made with the intention of influencing a third party or retain business or a business advantage or to reward the provision or retention of business or a business advantage or in explicit or implicit exchange for favours or benefits;
- It contravenes the law;
- It is given in your name, not in the name of the Trust or one of its schools;
- It includes cash or cash equivalent such as gift certificates or vouchers (other than as permitted under the Code of Conduct);
- Taking into account the reason for the gift, if it is an inappropriate type and value and given at an inappropriate time;
- It is given secretly;
- Where a third party is a government official or a representative or a politician or a political party.

## Appendix 1

### The Golden Thread Alliance

#### **Gifts and Hospitality Register – Single gift or hospitality over £30.00 or whole class gifts with an equivalent value over £5 per pupil**

Gifts of low intrinsic value, such as promotional calendars or diaries, or small tokens of gratitude gifts from pupils, parents and carers up to a value of £30.00 or gifts from a whole class of pupils up to the value of £5 per pupil can be accepted and do not need to be added to the Gifts and Hospitality Register.

#### Gifts Received

<b>Date</b>	<b>Staff Member</b>	<b>Gift From</b>	<b>Description</b>	<b>Value</b>	<b>Accepted/Declined</b>

#### Hospitality Received

<b>Date</b>	<b>Staff Member</b>	<b>Invite From</b>	<b>Occasion</b>	<b>Accepted/Declined</b>