



Gifts, Hospitality and Bribery Policy

Reviewed by FGB Committee on April 2026 , January 2026

Signed: V Davis

Chair of FGB Committee

Next review due: January 2027

Gifts, Hospitality and Bribery Policy

The principle of integrity requires that staff and Governors of Walmley Infant School should not place themselves under an obligation that might influence, or be perceived to influence, the conduct of their duties. This means that the receipt of hospitality and gifts must be subject to clear restrictions and that any that are accepted must be declared and recorded.

The process set out in this policy and procedure is designed to safeguard employees from any misunderstanding or criticism.

This policy takes into consideration the requirements under the UK Bribery Act 2010, which came into effect 1 July 2011.

The Chair of Governors is responsible for ensuring compliance with Walmley Infant School Policies and Procedures. This procedure applies to all Walmley Infant School staff.

Giving Gifts and Hospitality

You may not, directly or through others, offer or give any money, gift, hospitality or other thing of value to any employee or representative of any supplier, customer or other organisation, if doing so could reasonably give the appearance of influencing the organisation's relationship with the school.

- Staff may, with authorisation from the Headteacher, give gifts of a nominal value, as agreed by Governors, funded from the School Fund Account. This has been agreed at no more than £25. These gifts should never be funded from the school budget account. It should be noted that regular gifts (either monetary or in kind) may be perceived by HMRC as payment in kind and be subject to declaration to HMRC by the recipient.

Accepting Gifts and Hospitality

- You must not accept cash, or personal gifts with a significant monetary value, under any circumstances, although items of nominal value (approximately £25 or below) or free promotional pens, calendars, diaries or similar items may be accepted.
- Gifts which are of a value of more than £25 or are intended for Walmley Infant School as an academic body can be accepted but must not be retained by the individual who receives them. Such gifts

should be deposited with the Administration Office, following which they will be allocated as appropriate. They may, for example, be prizes for an end of year raffle for which all staff will be able to enter in to.

- Personal gifts may not be sought, either by formal request or suggestion, under any circumstances.
- When you have to decline a gift, you should be courteous but firm, and draw the attention of the person making the offer to the existence of this policy and the UK Bribery Act 2010.
- All offers of gifts or hospitality whether accepted or not must be recorded in the school's gifts and hospitality register, which is maintained by the Bursar.

Supplier Special Offer Gifts

Gifts are sometimes offered by suppliers with the purchase of items. All special offer gifts are the property of Walmley Infant School and must be turned into the Administration Office for use by the School.

Hospitality

- You should never accept lavish hospitality that could be interpreted as a way of exerting an improper influence over the way you carry out your duties. Nor should you offer such hospitality to others on behalf the school. The timing of hospitality in relation to a procurement or purchasing decision that the school may be taking is especially sensitive. You should never solicit hospitality. As a general rule, you should not accept hospitality that the School would not reciprocate in similar circumstances.
- Staff attendance at sporting and cultural events at the invitation of suppliers, potential suppliers or consultants is not normally acceptable. Where it is considered that there is a benefit to the school in a member of staff attending a sponsored event, the attendance should be formally approved by the Headteacher and recorded as appropriate.
- If necessary, you should pay your share of any costs and claim these in the usual way.
- When you have to decline hospitality, you should be courteous but firm, and draw the attention of the person making the offer to the existence of this policy and the UK Bribery Act 2010.
- You may accept modest working meals and light refreshments without making any declaration. All other hospitality must be

recorded in the school's gifts and hospitality register which is maintained by the Bursar.

Other hospitality may be accepted where:

- You are representing the school in the community or are imparting information about the school to the public
- An event is clearly part of the life of the community or where the school be seen to be represented
- The hospitality concerns attendance at a relevant conference or course where it is clear the hospitality is corporate rather than personal

Gifts to and from Students

In the interests of Safeguarding Children, and to prevent staff from being open to accusation of exerting undue influence, no member of staff is permitted to give a gift to a student at any time. If a gift is received from a student or the parents/carers of a student and the value is £15 or over, this gift is to be registered in the Register of Gifts and Hospitality.

Role of the Headteacher in relation to the Gifts and Hospitality Policy

The Headteacher will be responsible for:

- ensuring that any offer or receipt of gifts, hospitality or donations to staff is recorded in the School's Register of Gifts and Hospitality.
- reporting any possible conflict of interests arising from the offer or receipt of gifts and or hospitality.

Expense Claims

- Where hospitality is to be provided by Walmley Infant School this should be approved in advance by a member of the Leadership Team.
- The Headteacher or the Bursar should review the hospitality in light of the UK Bribery Act 2010. Hospitality is not prohibited by the Act but should be considered in light of it.
- Any hospitality, gifts provided by Walmley Infant School should not be extravagant. Governors have agreed that School Fund will be used for any expenses incurred in this respect. However, funds in this account are limited and expenditure will be strictly monitored.
- Claims for reimbursement of expenses should be made on the relevant Expenses Claim form and receipts should always be enclosed.

The DO's and DON'Ts

DO	DON'T
<ul style="list-style-type: none"> ➤ Read and follow the guidance on gifts and hospitality 	<p>Accept any gifts or hospitality which have a value of more than £25 without the approval of the Headteacher, or the Chair of Governors as necessary. These Gifts should be deposited with the Administration Office</p>
<ul style="list-style-type: none"> ➤ Seek advice from the Headteacher or Chair of Governors if you are in doubt 	<ul style="list-style-type: none"> ➤ Accept gifts or hospitality in the immediate period before tenders are invited or during the tender process.
<ul style="list-style-type: none"> ➤ Record all offers of gifts and hospitality which have a value of more than £25 in the School's register, whether accepted or not 	<ul style="list-style-type: none"> ➤ Accept cash or monetary gifts
<ul style="list-style-type: none"> ➤ Treat with caution any gifts or hospitality offered to you and think very carefully before accepting anything 	<ul style="list-style-type: none"> ➤ Accept a gift or hospitality as an inducement or reward
<ul style="list-style-type: none"> ➤ Take into account what the public's perception would be in deciding whether or not to accept a gift or hospitality 	<ul style="list-style-type: none"> ➤ Accept gifts or hospitality unconnected to your work, even if the hospitality is taken in your own time
<ul style="list-style-type: none"> ➤ Consider whether the offer is proportionate in deciding whether or not to accept hospitality from an outside body 	<ul style="list-style-type: none"> ➤ Accept a gift or hospitality which you or a member of the public would think is lavish, extravagant or excessive, even if the hospitality is taken in your own time
<ul style="list-style-type: none"> ➤ Err on the side of caution when deciding whether to accept a gift or hospitality. If the thought of the acceptance makes you uncomfortable, do not accept 	<ul style="list-style-type: none"> ➤ Accept gifts or hospitality offered to your husband, wife, partner, family member or friend
<ul style="list-style-type: none"> ➤ Consider paying for yourself if offered any hospitality by a supplier or third party 	