

Whitchurch Community Swimming Pool



POLICY

Gifts and Hospitality

Author	Date	Review Date
Matt Stafford	January 2024	January 2026
Matt Stafford	January 2025	January 2026

WCSP reserves the right to interpret, apply, and enforce this policy in its sole discretion.

1. Introduction

Whitchurch Community Swimming Pool (WCSP) is committed to maintaining the highest standards of ethical conduct and integrity in all aspects of its operations, including interactions with external parties. This Gifts and Hospitality Policy outlines the guidelines and procedures for offering and accepting gifts and hospitality to ensure compliance with the Bribery Act 2010 and to uphold the values and reputation of WCSP.

Action Summary: Any offer of gifts or hospitality, regardless of value, must be [promptly disclosed](#) to the designated compliance officer or relevant authority within WCSP. This includes both offers received and offers extended by WCSP. Acceptance of gifts or hospitality beyond a nominal value (£25) must be approved in writing by a designated authority within WCSP. Approval will be based on an assessment of the circumstances and potential risks involved.

2. Purpose

The purpose of this policy is to:

- Ensure transparency, fairness, and integrity in all dealings with external parties.
- Prevent any potential conflicts of interest or undue influence.
- Promote compliance with the Bribery Act 2010 and relevant legislation.
- Uphold the reputation and values of WCSP.

3. Definitions

- **Gifts:** Items of value, including but not limited to money, goods, services, or other benefits, given or received without expectation of payment.
- **Hospitality:** Any form of entertainment, accommodation, meals, or other expenses incurred by or provided to an individual or group.
- **External Parties:** Individuals, organizations, or entities outside of WCSP, including donors, partners, suppliers, and stakeholders.

4. Guidelines

- **Prohibition of Bribery:** Under no circumstances shall any employee, volunteer, or representative of WCSP offer, give, solicit, or accept any form of bribe, kickback, or improper inducement.

- **Acceptance of Gifts and Hospitality:** Employees, volunteers, and representatives must exercise caution when offered gifts or hospitality by external parties. Acceptance of gifts or hospitality must be in line with this policy and applicable laws and regulations.
- **Disclosure:** Any offer of gifts or hospitality, regardless of value, must be promptly disclosed to the designated compliance officer or relevant authority within WCSP. This includes both offers received and offers extended by WCSP.
- **Applicability of Value:** The value of gifts or hospitality is not the sole determinant of whether it is acceptable. Factors such as frequency, intent, and potential impact on impartiality must also be considered.
- **Approval Process:** Acceptance of gifts or hospitality beyond a nominal value (£25) must be approved in writing by a designated authority within WCSP. Approval will be based on an assessment of the circumstances and potential risks involved.
- **Recording and Reporting:** All accepted gifts and hospitality must be [accurately recorded in a central register](#) maintained by the compliance officer. This register should include details such as the nature of the gift or hospitality, value, date received or provided, and the parties involved.
- **Refusal and Return:** If it is determined that acceptance of a gift or hospitality may compromise the integrity or impartiality of WCSP, it must be refused or returned promptly to the giver with a clear explanation of the reason for refusal.
- **Consequences of Non-Compliance:** Violations of this policy may result in disciplinary action, up to and including termination of employment or termination of the relationship with volunteers or representatives, in addition to potential legal consequences.

5. Training and Awareness

WCSP shall provide regular training and awareness programs to all employees, volunteers, and representatives to ensure understanding and compliance with this policy and relevant legislation.

6. Review and Update

This policy shall be reviewed periodically to ensure its effectiveness and relevance. Amendments may be made as necessary to reflect changes in laws, regulations, or organizational requirements.

7. Contact Information

For questions, concerns, or reporting of potential violations of this policy, individuals may contact the designated compliance officer or relevant authority within WCSP. Please contact info@wcsp.org.uk for further guidance.

8. Compliance

All employees, volunteers, and representatives of WCSP are expected to comply with the provisions of this policy. Failure to do so may result in disciplinary action.

By accepting employment, volunteering, or representation with WCSP, individuals acknowledge their understanding of and commitment to adhere to this Gifts and Hospitality Policy.