

Gifts and Hospitality Policy

April 2021

Date Approved:	April 2021	Review Date:	April 2022	Approved:	The Trust Board
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1. **Aim of this Policy**

- 1.1. The intention of the policy is to ensure that the Academy 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 Academy. The Academy should be able to show that all decisions are reached on the basis 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 provision.
- 1.2. Any breach of this Policy could lead to disciplinary action and may constitute gross misconduct.

2. **Definitions**

- 2.1. A Gift is any item or service, award, prize or any other benefit which is received free of charge; or personally offered at a discounted rate or on terms not available to the general public or which might be seen to compromise the personal judgment or integrity of the recipient.
- 2.2. Hospitality is the offer of food, drink, accommodation or entertainment or the opportunity to attend any cultural or sporting event not available to the general public.

3. **Key Principles**

- 3.1. As a general guideline, business gifts, hospitality, awards, prizes or any other benefit which might be seen to compromise personal judgment or integrity should not be accepted by any member of staff, except as provided for below. If you are unsure please seek guidance from your Manager.
- 3.2. Staff shall not use their authority or office for personal gain and shall seek to uphold and enhance the standing of the Academy by:
 - 3.2.1. Maintaining an unimpeachable standard of honesty and integrity in all their business relationships.
 - 3.2.2. Complying with the letter and spirit of the law, and contractual obligations, rejecting any business practice that might be deemed improper.
 - 3.2.3. At all times in their business relationships acting to maintain the interests and good reputation of the Academy.
 - 3.2.4. Any member of staff who becomes aware of a breach of policy must report this immediately to his or her Manager who will instigate investigations as necessary.
 - 3.2.5. Any personal interest that may impinge or might reasonably be deemed by others to impinge on staff impartiality or conflict with the duty owed to the Academy in any matter relevant to staff duties (such as conflicting business interests) should be declared in writing. 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 for entry into the Gifts and Hospitality Register.
 - 3.2.6. Staff are not permitted to accept gifts, rewards or benefits from members of the public or organisations the Academy has official contacts with only where they are isolated gifts of a trivial character (such as diaries, calendars or chocolates). 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.

3.2.7. Where purchased items include a "free gift", such gifts should be either used for Academy business or handed to the Academy to be used at charity raffles etc.

3.2.8. In relation to conventional hospitality (lunches, outings, tickets for events etc.) provided that it is normal and reasonable in the circumstances they may be accepted. Such invitations should not be accepted where there is no reasonable business justification for doing so, where an invitation is disproportionately generous, or where the invitation could be seen as an inducement to affect a business decision.

Any hospitality other than of a nominal value (up to £30) or facilities provided during the normal course of business should be reported for an entry in the Gifts and Hospitality Register which should include (date of offer/event, name, job title and organisation of recipient/provider, nature and purpose of gift or hospitality received or declined, the name of any other organisation involved, and the estimated value).

3.2.9. Any gifts over the value of £30 must be recorded in the Gifts and Hospitality Register by the Finance Manager.

3.2.10. Small personal gifts received from parents and/or students as a thank you for your work are acceptable providing they are valued at less than £30. These will not need to be entered onto the Gifts and Hospitality Register.

4. Academy Trust Providing Gifts

4.1. When giving gifts the Academy Trust will ensure that the value of the gift is reasonable, within the Academy Trust's Scheme of Delegation if applicable, the decision is fully documented and the Academy Trust has due regard to propriety and regularity in the use of public funds. The decision will also be documented in the Gifts and Hospitality Register. This does not apply to the award of gifts; prizes etc. related to the achievement of pupils e.g. attainment or merit awards. Alcohol is not permitted to be purchased by the Academy as a gift.

4.2. Where hospitality is provided by the Academy Trust this should be approved in advance by the Headteacher of the Academy. The Headteacher will ensure that the costs are appropriate for a publically funded organisation. Hospitality such as working lunches, coffees etc and modest hospitality are acceptable where it is appropriate to offer or receive these in support of good relationships with visiting staff or business colleagues. These do not need to be added to the Gifts and Hospitality Register. Hospitality above this level should be added to the Register.

5. Unacceptable Gifts/Hospitality

5.1. The following are examples of offers of gifts/hospitality which should be refused by staff:

5.1.1. gifts of money (not including donations to the Academy);

5.1.2. free membership or subscriptions (e.g. sports clubs);

5.1.3. gifts of hospitality from a potential supplier in the immediate period before tenders are invited or during the tender process; and

5.1.4. foreign travel unless as a specific element of a business, academic or research activity approved by the Academy.

- 5.2. Any offers of gifts and hospitality falling into any of the above categories should be reported to your Manager.

6. **Declaration and Registration of Gifts**

- 6.1. All staff should make a declaration as soon as possible after the offer or receipt of gifts or hospitality if the value exceeds £30, a reminder will be sent to staff yearly.
- 6.2. All declarations over £30 are to go to the Finance Manager. The Finance Manager will record the declarations in the Gifts and Hospitality Register. The register is an annual document and will be maintained on a calendar year basis.
- 6.3. It is recommended that you make your declaration by email, and retain a copy for your personal records.
- 6.4. Your declaration will need to include the following information:
 - 6.4.1. date of offer of gift or hospitality, and date of event where relevant;
 - 6.4.2. name, job title and organisation of recipient / provider;
 - 6.4.3. nature and purpose of gift or hospitality received or declined;
 - 6.4.4. the name of any other organisation involved; and
 - 6.4.5. estimated value.

7. **Monitoring**

- 7.1. The Gifts and Hospitality Register is maintained by the Finance Manager and will be reviewed by an internal auditor on a regular basis to ensure compliance has been followed by all members of staff.
- 7.2. Staff will be reminded periodically of their requirement to declare gifts and hospitality provided/accepted/declined in accordance with this Policy.
- 7.3. Staff who fail to declare the acceptance/provision/decline of hospitality and gifts in accordance with this Policy may be subject to disciplinary action.

8. **Disclosure by the Academy**

- 8.1. All aggregate figures for transactions of any amount which exceed £5,000 and/or individual transactions which exceed £5,000 where gifts have been made by the Academy Trust will be disclosed to the Department for Education/Education Skills Funding Agency.