



Gifts and Hospitality Policy

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1.0 Policy Statement

1.1 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.

1.2 The Trust should be able to show that all decisions are reached on the basis of value for money and for no other reason.

1.3 Any consideration of whether or not the principles of this policy have been breached will be determined by reference to this provision.

2.0 Scope and purpose

2.1 This policy is intended to comply with the requirements of the Academy Trust Handbook (ATH), which states that:

“Academy trusts should have a policy and register on the acceptance of gifts, hospitality, awards, prizes or other benefits that might compromise their judgment or integrity and should ensure all staff are aware of it. When making gifts, the trust must ensure the value is reasonable, is within its scheme of delegation, the decision is documented, and achieves propriety and regularity in the use of public funds”.

2.2 As a general guideline, business gifts and hospitality should not be accepted by any member of staff, except as provided for below. This ensures the Trust demonstrates propriety and regularity in the use of public funds.

2.3 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.

2.4 Any employee who becomes aware of a breach of policy must report this immediately to their line manager who will take advice and instigate investigations, as necessary.

2.5 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.

2.6 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 Register of Business Interests.

2.7 The Gifts and Hospitality Register will be subject to external review by auditors.

3.0 Accepting of gifts

3.1 Employees are permitted to accept gifts, rewards, or benefits from members of the public or organisations the Trust has official contacts with only where they are isolated gifts of a trivial character (such as diaries or calendars) or 'one-off' token gifts from parents. Gifts should not therefore be accepted if they appear to be disproportionately generous or could be construed as an inducement to affect a business decision.

3.2 Personal gifts from employees to pupils are inappropriate and could be misinterpreted and may lead to disciplinary action.

3.3 The following general rules apply and must guide decisions on receipt of gifts and hospitality as an employee of the Trust:

- to accept gifts should be the exception. You may accept small 'thank you' gifts of a reasonable value, such as a diary, a coffee mug or bunch of flowers, not over £25 in value. You should notify the CFO of any gift or hospitality over this value for entry in the Register of Business Interests.
- always say "no" if you think the giver has an ulterior motive. Be sensitive to the possibility that the giver may think that even small gifts or simple hospitality will elicit a more prompt service or preferential treatment.
- never accept a gift or hospitality from anyone who is, or may be in the foreseeable future, tendering for any contract with the Trust, seeking employment with the Trust or is in dispute with the Trust, even if you are not directly involved in that service area.
- where items purchased for the Trust include a 'free gift', such a gift should either be used for Trust business or handed to the academy office or Academy Lead to be used for charity raffles.
- if you are in doubt about the acceptability of any gift or offer of hospitality, it is your responsibility to consult the Academy Lead or CFO.

3.4 A gauge of what is acceptable in terms of hospitality is whether this Trust would offer a similar level of hospitality in similar circumstances.

- occasional working lunches with customers, providers or partners are generally acceptable as a way of doing business, provided they are not to an unreasonable level or cost.
- invitations to corporate hospitality events must each be judged on their merit. Provided the general rules have been considered, it may be acceptable to join other company/organisation guests at:
 - sponsored cultural and sporting events, or other public performances, as a representative of the Trust.
 - special events or celebrations.
- however, consider the number of these events, and always take into consideration what public perception is likely to be if they knew you were attending.
- acceptability depends on the appropriateness of the invitations, in terms of the level of hospitality, the frequency and the status of the invited employee. In all such cases the Academy Lead must be consulted.
- paid holidays or concessionary travel rates are not acceptable. Neither are offers of hotel accommodation nor the use of company villas/apartments.

- if you are visiting a company to view equipment that the Trust is considering buying, you should ensure that expenses of the trip are paid by the Trust. Acceptance of refreshments and/or a working lunch may be acceptable, but care must be taken to ensure that the Trust's purchasing and/or tender procedures are not compromised.
- acceptance of sponsored hospitality that is built into the official programme of conferences and seminars related to your work are acceptable.
- offers to speak at corporate dinners and social gatherings, or events organised by, for example, a professional body, where there is a genuine need to impart information or represent the Trust must be agreed in advance with your Academy Lead. Where your spouse or partner is included in the invitation, and approval has been given for you to attend, it will be acceptable for your spouse or partner to attend as well, but if expenses are incurred, these will be met personally.
- any invitation you accept should be made to you in your professional/working capacity as a representative of the Trust.

3.5 All gifts and hospitality must be immediately recorded on the Trust Gifts and Hospitality register, available from the academy office.

3.6 The Gifts and Hospitality Register will be regularly reviewed internally and is subject to external review by internal and external auditors.

3.7 The completed Register for each academic year will form part of the year end schedules.

3.8 A new register will be sent out to each academy for the new academic year.

