

Gifts and Hospitality Policy

1. Policy Purpose

The Cidari Multi Academy Trust is committed to the highest level of integrity, honesty and accountability in all its business dealings. All staff, trustees, and governors are expected to maintain high standards of propriety and professionalism in all their dealings, ensuring they are free from any conflict of interest through their business in the name of the Academy Trust.

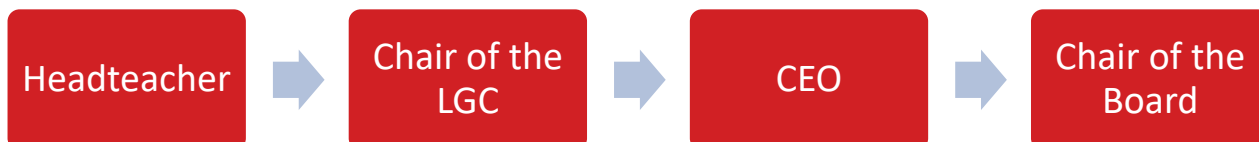
2. Statement of Objectives

To establish a policy for Gifts and Hospitality Policy in the Trust.

This document should be used by all employees and stakeholders of Cidari Education Ltd (the Trust) to understand the obligations placed upon the Trust to manage risk.

There is a legal requirement for this policy to be publicised on the academy's website. This document will also be stored in the Trust's Policy File for employees and stakeholders.

3. Reporting Structure



4. Policy Detail

1. Background

1.1 The Cidari Multi Academy Trust is committed to the highest level of integrity, honesty and accountability in all its business dealings. All staff, trustees, and governors are expected to maintain high standards of propriety and professionalism in all their dealings, ensuring they are free from any conflict of interest through their business in the name of the Academy Trust.

1.2 In order to protect all individuals associated with the Trust, and the reputation of the Trust and its academies, from accusations of bribery or corruption staff, trustees, and governors must take extreme care that none of their dealings, directly or indirectly, could be deemed as a reward or benefit, in line with the Prevention of Fraud and Bribery Act 2010. This Act makes it a criminal offence to:

- offer, promise or give a bribe
- request, agree to or accept a bribe
- (by an organisation) fail to prevent bribery by those acting on its behalf ('associated persons') to obtain or retain business or a business advantage for the organisation. Under this Act, a bribe is 'a financial or other advantage' offered, promised or given to induce a person to perform a relevant function or activity improperly, or reward them for doing so.

1.3 The Trust and each academy will hold a Gifts and Hospitality Register. All gifts/ hospitality over the value of £25 must be recorded in the Gifts and Hospitality Register.

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. Dealing with Gifts and Hospitality

3.1 The Trust expects staff, trustees, and governors to exercise the utmost discretion in giving and accepting gifts and hospitality when on Trust or academy business. Particular care should be taken about a gift from a person or organisation that has, or is hoping to have, a contract with our organisation. In any case of doubt advice should be sought from the CEO or Trust Finance Officer.

3.2 Staff, trustees and governors must not make use of their official position to further their private interests or those of others.

3.3 Staff, trustees and governors must not accept gifts, hospitality or benefits of any kind from a third party where it might be perceived that their personal integrity is being compromised, or that the Trust/academy might be placed under an obligation.

3.4 Gifts of low intrinsic value such as promotional calendars or diaries, or small tokens of gratitude, can be accepted. If there is any doubt as to whether the acceptance of such an item is appropriate, individuals should decline the gift or refer the matter to the academy CEO or Trust Finance Officer.

3.5 It is common for appreciative parents and pupils to register their thanks for the work of staff in the form of a small personal gift. If these are valued at less than £25 these are perfectly acceptable without reference to senior members of staff. These will not need to be recorded in the register. Where gifts valued over £25 are accepted, these should be recorded in the register.

3.6 Where a more valuable gift, benefit or service is offered which is to the good of the academy, rather than an individual, it must be referred to the CEO or, if in the case of the CEO, to the Trust Finance Officer for approval within their discretion; if acceptable, these items must be recorded in the register.

3.7 Hospitality such as working lunches, coffees etc. are perfectly acceptable where it is appropriate to offer or receive these in support of good relationships with visiting staff or business colleagues. Modest hospitality, provided it is reasonable in the circumstances, should be similar to the scale of hospitality which the Trust as an employer would be likely to offer. These would not be added to the register. Hospitality received above this level should be recorded in the register.

3.8 If a member of staff, trustee or governor is offered a gift or hospitality whilst involved in the procurement of goods and services, tenders for work or when liaising with anyone conducting business with the school (other than light refreshments) it is their responsibility to discuss this with the Trust Finance Officer immediately.

3.9 If not accepting a gift would be regarded as causing offence (such as a sudden and unexpected gift or one where refusal could cause cultural offence) the item should be accepted. The matter should then be brought to the attention of the Trust Finance Officer as soon as possible who may decide to return the gift, or may donate it to a school raffle/ fair or a charitable cause.

3.10 Examples of gifts or hospitality that should not be accepted are cash or monetary gifts; gifts or hospitality offers to a member of your family; gifts or hospitality from a potential supplier or tenderer in the immediate period before tenders are invited or during the tender process; staff, trustee or governor attendance at sporting and cultural events at the invitation of suppliers, potential suppliers or consultants. (Where it is considered that there is a benefit to the Trust or one of its academies in a member of staff, trustee or governor attending a sponsored event, the attendance must be formally approved and registered by the Trust Finance Officer).

3.11 Where a gift is received on behalf of the academy, the gift remains the property of the academy. The gift may be required for display or it may, with the Headteacher's approval, remain in the care of the recipient. Unless otherwise agreed, the gift should be returned to the academy on or before the recipient's last working day.

3.12 Gifts are sometimes offered by suppliers with the purchase of items. All such special offer gifts are the property of the academy and must be used accordingly.

4 Giving Gifts and Hospitality

4.1 The Trust and its academies will not normally give gifts to other individuals or organisations. If gifts are given, staff must ensure that the decision is fully documented in the Gift and Hospitality Register and has regard to the propriety and regularity of the use of public funds. This does not apply to the award of gifts, prizes etc. related to the achievement of pupils e.g. attainment or merit awards.

4.2 Where hospitality is provided by the Trust or its academies this should be approved in advance by the Finance Officer or local Business Manager. In approving hospitality the Finance Officer / Business Manager should ensure it is not in breach of the UK Bribery Act 2010 and also that the costs are appropriate for a publically funded organisation. Hospitality such as working lunches, coffees etc. and modest hospitality in the form of meals etc. are perfectly acceptable where it is appropriate to offer or receive these in support of good relationships with visiting staff or business colleagues (but not for their family or friends). These would not be added to the register. Hospitality provided above this level should be recorded in the register.

5 Non Compliance

5.1 In the case where it is believed a member of staff, trustees, and governors has not declared a gift or hospitality then a formal investigation will be instigated by the CEO /Finance Officer. If misconduct is indicated, this may take the form of disciplinary procedures in the case of employees.

5. Risk Management

The Trust's Business Plan reflects that Gifts and Hospitality is a key responsibility. With regard to this the Trust will seek to mitigate against risk through managing Gifts and Hospitality in an efficient, effective and economic manner.

6. Funding

No funds are required to uphold this policy as all actions arising will be dealt with under the Trust's normal course of business.

7. Training

There are no training requirements for stakeholders of the Trust.

8. Record Keeping

It is essential that all information is accurately recorded and maintained primarily within the academy to ensure the service is delivered in line with this policy. The methods and procedures of record keeping, to be followed, are contained within the guidance and procedures.

9. Performance Management/Monitoring and Reporting

The Trust will seek to involve employees and stakeholders in the review of performance either as part of normal monitoring meetings or via separate individual academy meetings.

10. The Board and the Executive Leadership Team

The Board will receive regular updates on the implementation of the Gifts and Hospitality Policy so that they can have assurance that it is operating effectively in practice.

The Executive Leadership Team has responsibility for overseeing the Gifts and Hospitality Policy.

The Cidari Administrator / PA will provide support.

Overall responsibility for ensuring full 100% compliance will rest with the Executive Leadership Team.

11. Equality and Diversity

This policy complies with current Equality and Diversity legislation to ensure equality of treatment for all without discrimination or prejudice. The policy will pay particular regard to ensure it is sensitive to such diversities surrounding access to academies and delivery of the curriculum.

12. Strategic Aspiration Aims

The Trust will have a number of aspirations to improve service to stakeholders. Two of the main current aims under this policy are:

- To become an 'Employer of Choice'
- To provide high quality education

13. Future Reviews

The Trust will review the Gifts and Hospitality Policy annually or sooner if required by statutory, regulatory or best practice requirements or the need to update following reviews of other policies.

The Executive Leadership Team will be responsible for this review and ensuring this policy and the procedures supporting its implementation remain up to date.

14. Compliance with Regulatory Standards, Legal Obligations and Definitions

This policy operates within the context of regulatory legal frameworks as follows:

Academies Financial Handbook 2019

15. Corporate Fit

This policy is consistent (where relevant) with the Trust's current policies.

As polices are formulated it will be the responsibility of the Executive to ensure any necessary updates to this policy are made in a timely manner.

When undertaking the scheduled review the Executive will ensure the policy remains complimentary with the above and any relevant iteration thereof including any new policies that are implemented from time to time between scheduled reviews.

INFORMATION

DATE/DETAILS

Policy Name

Gifts and Hospitality Policy

Prepared by

Peter Ashworth

Policy Created

July 2016

Date of Last Review

Date of Current Review

July 2019: CEO & Trust Chair

Date of Next Review

July 2020

Consultation

Board of Directors

Pending

Equality Analysis

Approved By

Date Approved

Responsible for Version Control

Overall Responsibility for Policy

Peter Ashworth