



Gifts and Hospitality Policy

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1. Introduction

1.1. General Guidance

As a general guideline, business gifts and hospitality should not be accepted by any member of staff, except as provided for below.

1.2. Aims

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.

1.3. Who it applies to

This policy applies to all schools across the federation. Any breach of this Policy could lead to disciplinary action and may constitute gross misconduct.

2. General Principles

Employees shall not use their authority or office for personal gain and shall seek to uphold and enhance the standing of the Academy 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 Academy.

Any employee who becomes aware of a breach of policy must report this immediately to his or her manager who will instigate investigations as necessary.

3. Register of Interests

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 Academy in any matter relevant to an employee's 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 to the CEO for entry into the Register of Business Interests.



All Principals, Central Leadership and governors are required to annually complete a Declaration of Interests.

4. General Guidance

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 Academy, seeking employment with the Academy or is in dispute with the Academy, even if you are not directly involved in that service area.

If you are in doubt about the acceptability of any gift or offer of hospitality it is your responsibility to consult the Finance Director or Regional Director.

5. Acceptance of Gifts

Employees are permitted to accept gifts, rewards or benefits from parents, other members of the public or organisations the Academy has official contacts with only where they are isolated gifts of an amount up to £30 and covers such items as diaries, calendars, chocolates, a bottle wine or bunch of flowers. 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.

Gifts which are intended for the Trust and Academy body may be accepted but not retained by the individuals receiving them. The CEO will then determine the use and distribution, eg school fayre.

6. Acceptance of Hospitality

Any hospitality over £50 should be reported to the PA to the CEO for entry in the “**The Gifts and Hospitality Register**” which is reported annually to the Risk and Audit Committee.

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.

A gauge of what is acceptable in terms of hospitality:

- 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 taken into account, it may be acceptable to join other company/organisation guests at:
 - a. sponsored cultural and sporting events, or other public performances, as a representative of the Academy;
 - b. special events or celebrations.

But, 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 Head of School 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 the Regional Director.
- Any invitation you accept should be made to you in your professional/working capacity as a representative of the Trust.

7. "Internal Hospitality" or Staff Entertaining / Well Being

In relation to "internal hospitality" (or Staff Entertaining) this is guided by provisions in the Academies Accounts Direction, as well as general good corporate governance. The Academies Financial Handbook states that academy trusts must ensure that:

- Spending has been for the purpose intended and there is probity in the use of public funds
- Spending decisions represent value for money, and are justified as such



As a result schools should not use delegated public funds for the purposes of buying gifts for staff. Gifts for staff birthdays and weddings for example should be funded through staff contributions and not school funds.

Furthermore the following should also be noted:

- Any re-imbusement for alcoholic beverages is not permissible under any circumstance – either as staff reimbursement (expenses) claim or direct charge / invoice.
- Cash gifts are not acceptable
- Staff are responsible for contributing to their own staff tea / coffee funds and we should not be seen as diverting public funds away from the provision of educational needs, however provision of staff drinks whilst on duty is permissible

Provision of catering / hospitality at working meetings, eg open evenings, is permissible at the discretion of the Principal within and agreed budget – a typical example being flowers in the case of a bereavement where a member of staff's immediate family has died. But it needs to be monitored to ensure public funds are being used appropriately. Such transactions need to be approved, including monetary values, and does require pre-approval from Principal. This will also be monitored at monthly School Finance reviews.

- Subsidising staff events – The Academies Financial Handbook provides a number of guidelines which restrict subsidising staff event. Agreement for such events to take place requires sign off by the CEO and Head of Finance before any event is discussed with staff.