



Gifts & Hospitality Policy

Status and review cycle: Every Year

Reviewed: Finance Director

Review Date: 1st March 2016

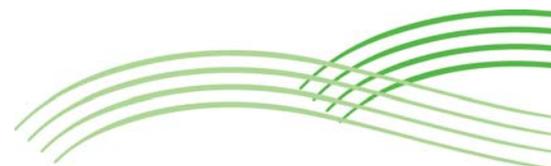
Next review date: Currently under review

“Values, culture and character through excellence in standards”



White Horse Federation Multi Academy Trust
Gifts and Hospitality Policy

<u>TITLE:</u>	<u>Gifts and Hospitality</u>
<u>PRINCIPLE:</u> THE RATIONALE	<p>Principle</p> <p>Publicly funded bodies, such as The White Horse Federation (TWHF), must be impartial and honest in the conduct of their business.</p> <p>Academy staff should not place themselves under an obligation that might influence, or be perceived to influence, the conduct of their duties. This means that the receipt of hospitality and gifts must be subject to clear restrictions and that any that are accepted must be declared and recorded.</p> <p>The Register (see Appendix) (where is Appendix) is maintained by the PA to CEO and is reported on annually to the Risk & Audit Committee</p>
<u>DEFINITIONS:</u>	<p>Definitions</p> <p>These guidelines are mandatory on staff and Governors of TWHF. For simplicity the term 'staff' is used in these guidelines for both staff and Governors.</p>
<u>PURPOSE :</u> (or objective)	<p>Objectives</p> <p>The intention of the policy is to ensure that TWHF can demonstrate that no undue or improper influence has been applied, or could be perceived to have been applied, by any supplier or anyone else. TWHF must be able to show that all decisions, whether educational, financial or otherwise are reached on the basis of the proper application of established procedures and for no other reason.</p> <p>Any breach of this policy by staff could lead to disciplinary action and may constitute gross misconduct.</p>
<u>IMPLEMENTATION:</u>	<p>Gifts</p> <p>TWHF encourages and expects staff to use their networks and contacts for its benefit. However, it is not acceptable for staff in any circumstances to corruptly accept any inducement or reward for doing or refraining from doing anything in their official capacity. Staff should not offer such gifts on behalf of TWHF.</p> <p>Personal gifts may not be solicited under any circumstances.</p> <p>Gifts that cannot be accepted:</p> <ul style="list-style-type: none"> • A gift of cash under any circumstances. • Personal gifts with a significant monetary value (more than £30) except in the circumstances outlined in the next section.



When you have to decline a gift, you should be courteous but firm, and draw the attention of the person making the offer to the existence of this policy.

Gifts that can be accepted:

- Gifts with a value of approximately £30 or less. These might include chocolates, flowers, calendars, diaries or similar items.
- Gifts which are intended for TWHF an academic body can be accepted but must not be retained by the individual who receives them. Such gifts should be deposited with the PA to the CEO for recording in the Register.
- Gifts with a value of £30 or more can sometimes be accepted. Before accepting such gifts staff must 1) seek **prior** approval from the Principal or Head of Functional Area in the case of central functions, 2) apply the 'Prove it' test outlined in annex one, and 3) declare the gift in writing to the PA to CEO who will ensure the Register is updated.

Hospitality

Staff should never accept hospitality that could reasonably be perceived as a way of exerting an improper influence over them in the way they carry out their duties. Staff should not offer such hospitality to others on behalf of the Federation.

Staff should never solicit hospitality.

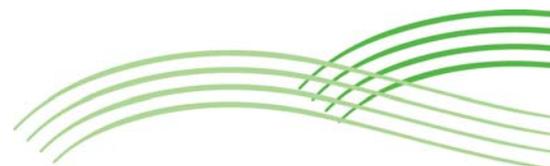
The timing of hospitality in relation to procurement or purchasing decision that the Federation may be taking is especially sensitive.

When you have to decline hospitality, you should be courteous but firm, and draw the attention of the person making the offer to the existence of this policy. If necessary, you should pay your share of any costs and claim these costs back from the Federation as expenses.

Hospitality can be accepted by staff in the following circumstances **without** being declared:

- Staff can accept working meals and light refreshments such as those routinely available on training courses, conferences or similar events.
- Staff representing the Federation in the community or presenting information about the Federation to the public.
- Staff attending an event which is clearly part of the life of the local community or where the Federation should be seen to be represented.

For all other hospitality, staff must 1) seek prior approval from the Principal or the Head of Functional Area for central areas 2) apply the 'Prove it' test outlined in annex one (where is Annex one), and 3) declare the hospitality in writing to the PA to CEO who will update the central Register.



	<p>Reporting Arrangements</p> <p>The register will be summarized and reported at least on an Annual basis to the Audit and Risk Committee.</p>
<p><u>Annex I</u></p>	<p>‘Prove it’ test</p> <p>Please use the following guideline to determine whether an offer of a gift or hospitality is acceptable:</p> <p>Purpose: Token, thanks or seeking a favour? Token/thanks = Yes, Favour = No</p> <p>Rules Does this situation conform to the Federations Gifts and Hospitality Policy?</p> <p>Openness Is the offer of a gift or hospitality transparent?</p> <p>Value Expensive or inexpensive?</p> <p>Ethics Does the offer fit with Federation’s values and ethics?</p> <p>Identity Who has made the offer?</p> <p>Timing Are you about to make a decision affecting the giver?</p>

