



Gifts and Hospitality Policy

July 2019

**Reviewed and approved by Sentamu Academy Learning Trust Board of Directors on 10
July 2019**

The next 'Period of Review' will be **July 2021**

Sentamu Academy Learning Trust

Vision Statement:

“Be Extraordinary”

Mission Statement:

We believe that young people achieve their fullest potential when they have a vision of everything their lives could become. The Bible (John 10:10) quotes Jesus as saying, “I have come that they may have life and may have it in all its fullness”. As academies, we commit ourselves to inspiring our students, and equipping them with the resilience and determination to unlock their unique gifts and realise their highest aspirations. We aim to achieve this through following distinctively Christian principles, and focusing on four key areas, service, achievement, leadership and teamwork.

Gifts and Hospitality Policy

1. Introduction

- 1.1. The receipt of gifts or excessive hospitality can damage the Trust’s reputation and possibly lead to prosecutions for corruption.
- 1.2. This policy seeks to protect staff from suspicion of dishonesty and ensure that they are free from any conflict of interest with respect to the acceptance or provision of gifts, hospitality, or any other inducement from or to suppliers of goods or services to the Trust and each of its academies.
- 1.3. As a general guideline, business gifts and hospitality should not be accepted by any member of staff, except as provide for below.
- 1.4. Any breach of this policy could lead to disciplinary action and may constitute gross misconduct.

2. General principles

- 2.1. Employees shall not use their authority or office for personal gain and shall seek to uphold and enhance the standing of Sentamu Academy Learning Trust by:
 - 2.1.1. Maintaining an unimpeachable standard of honesty and integrity in all their business relationships;
 - 2.1.2. Complying with the letter and spirit of the law, and contractual obligations rejecting any business practice that might be deemed improper;
 - 2.1.3. At all times in their business relationships acing to maintain the interests and good reputation of Sentamu Academy Learning Trust.
- 2.2. Any employee who becomes aware of a breach of policy must either report this immediately to his or her manager who will instigate investigations as necessary or refer to the whistle blowing policy.

3. Register of Business Interests

- 3.1. The Trust board and local governing committee of each academy is required to keep a register of business interests. The register must list for each member of the Trust, governing body, the Principal/Headteacher and any member of academy staff involved in purchasing decisions any business interests they or any member of their immediate family have.
- 3.2. Anybody with a business interest should not participate in discussions relating to those interests.
- 3.3. The Register of Business Interests should be used to identify any business, commercial or financial interests they have which might give rise to a potential conflict of interest. For example: that they, or a close friend, or relative, are an owner, director, or employee of a supplier to the academy.
- 3.4. Potential conflicts of interest might conceivably extend to other situations; such as if a relationship existed between two people where one could influence the appointment, advancement, or pay of another.
- 3.5. Essentially all staff should consider whether they have any interests (or relationships) which could in some circumstances lead to suggestions that their objectivity and integrity is compromised, and record these confidentially for consideration by the Principal and Governors.
- 3.6. Register of business interest forms can be obtained from Human Resources or the PA to the Principal and will be retained by the relevant Clerk to Governors.

4. Register of Gifts

- 4.1. In the interests of transparency, a Register of Gifts and Hospitality is to be established and kept in the Finance/Business Office.
- 4.2. Any member of staff who accepts an offer of a gift or hospitality over the value of £30 must ensure this is recorded in this register using the form attached.
- 4.3. The following should be specified:
 - 4.3.1. Nature of gift/hospitality. In the case of a gift, it should be specified whether it is a personal gift for the recipient or a related party, such as a partner, or a corporate gift accepted by the recipient on behalf of the Trust or academy.
 - 4.3.2. Value of gift/hospitality. If the exact cost is not known, an estimate should be provided.
 - 4.3.3. Name of firm / individual concerned.
 - 4.3.4. Date gift/hospitality accepted.
 - 4.3.5. Name of member(s) of staff involved.

5. Principles

- 5.1. The Trust expects staff and members of the Governing Body to exercise the utmost discretion in giving and accepting gifts and hospitality when on 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 the Trust or one of its Academies.
- 5.2. Staff 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 might be placed under an obligation.
- 5.3. Staff must not make use of their official position to further their private interests or those of others.

6. Gifts and Hospitality

- 6.1. 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, staff should decline the gift or refer the matter to their Principal or Line Manager.
- 6.2. Where approval is granted, any gift or hospitality received with an equivalent value of £30 or over must be recorded in the Register of Gifts and Hospitality.
- 6.3. Where purchased items include a 'free gift' such gifts should be either used for Academy business or handed to the Principal or Director of Finance to be used at a charity raffle etc.
- 6.4. In cases where a staff member receives a gift on behalf of the Trust, the gift remains the property of the Trust. The gift may be required for departmental display or it may, with the Line Manager's approval, remain in the care of the recipient. Unless otherwise agreed, the gift should be returned to the Department on or before the recipient's last working day.
- 6.5. Modest hospitality, provided it is reasonable in the circumstances, for example, lunches in the course of working visits, may be acceptable, though it should be similar to the scale of hospitality which Sentamu Academy Learning Trust as an employer would be likely to offer.
- 6.6. Staff attendance at sporting and cultural events at the invitation of suppliers, potential suppliers or consultants is not normally acceptable. Where it is considered that there is a benefit to Sentamu Academy Learning Trust in a member of staff attending a sponsored event, the attendance should be formally approved by the Principal.
- 6.7. Business gifts, which include hospitality, may be provided by the Trust in connection with third party entertaining but should be regarded as the exception rather than the rule. Gift and Hospitality must not exceed £50 in a year for any one recipient,

and must not be provided in expectation of material benefit to the Trust or one of its academies.

- 6.8. In respect of claims for the CEO, the CFO can sign off the £200 for travel and corporate hospitality per quarter and in the case of planned trips and training £500.
- 6.9. For information relating to Trust purchase of hospitality, gifts or rewards please refer to the Expenses policy.

7. Gifts to Staff

- 7.1. The purchase of any form of alcohol from trust funds, regardless of the source of the funds is strictly prohibited
- 7.2. The Trust may choose to purchase gifts for employees for the purposes of supporting, incentivising or reward, if approved by the Principal or the Chair of the LGC of the relevant academy, in line with 7.1. When purchasing gifts, consideration should be given to whether the purchase value is sensible and if the value would potentially seem excessive to an external body. A value of £25 is recommended for general gifts, such as vouchers or flowers, with a maximum spend of no more than £50 per person, per purchase.
- 7.3. The Principal, Chair of the LGC or the Board may, in exceptional circumstances, authorise the purchase of gifts beyond £50 but must provide clearly documented rationale as to why this was appropriate.
- 7.4. The principles set out in 7.1, 7.2 & 7.3 should also be used when purchasing gifts for LGC and Board members, volunteers and members of connected bodies to the Trust if deemed appropriate by a Principal or a Chair.
- 7.5. Individual academy Principals can request permission to fund staff functions from the CEO of the Trust, from academy funds in advance. This must be documented for audit purposes, eg an e-mail and a copy kept with the related purchases.
- 7.6. When deciding a budget for functions the principles set out in 7.1 & 7.2 must be adhered to (excluding the £50 limit)
- 7.7. More than two functions for any academy in one academic year must get prior board approval.

8. Gifts to and from Students

8.1. In the interests of Safeguarding Children, and to prevent staff from being open to accusation of exerting undue influence, no member of staff is permitted to give a gift to a student. The only exception to this would be where members of staff wish to give all students in a class a token gift of low value e.g. at Christmas.

8.2. If a gift is received from a student or the parents' of a student and the value is £15 or over, this gift is to be registered in the Register of Gifts and Hospitality

Declaration of Offer/Receipt of a Gift or Hospitality

In accordance with the Gifts and Hospitality Policy, I wish to make the following declaration:-

1. OFFER OF GIFT/HOSPITALITY OFFERED OR RECEIVED

Nature of Gift/Hospitality and Reason for Offer	By Whom Gift Was Offered	Approximate Value	Date of Offer

2. ACCEPTANCE OF GIFT/HOSPITALITY

Was the gift/hospitality accepted? (please tick appropriate box)

Yes No

3. NAME OF PRINCIPAL OR SLT MEMBER CONSULTED (IF REQUIRED)

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4. REASON FOR ACCEPTANCE/REFUSAL

If the gift/hospitality was accepted/refused, please briefly give reasons:

.....

Signed (Employee) Job Title

Please print name Date

Signed (Principal/SLT LINK)

Please print name Date

On completion please submit to the Director of Finance/Business Manager.