



**GIFTS AND HOSPITALITY POLICY**

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### 1 Summary

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.

Any breach of this Policy could lead to disciplinary action and may constitute gross misconduct.

### 2 Introduction

Employees shall not use their authority or office for personal gain in their business relationships and shall seek to uphold and enhance the standing of the Academy by:

- maintaining an unimpeachable standard of honesty and integrity
- complying with the letter and spirit of the law, and contractual obligations, rejecting any business practice that might be deemed improper.
- acting to maintain the interests and good reputation of the Academy.

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

### 3 Gifts

#### 3.1 Acceptance of Gifts

To accept gifts should be the exception. You may accept small 'thank you' gifts of token value, such as a diary, a coffee mug or bunch of flowers, not over £25 in value. You should notify the Accounting/Resources Manager of any gift or hospitality over this value for entry in the Register of Gifts and Hospitality.

- 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.
- Where items purchased for the Academy include a 'free gift', such a gift should either be used for Academy business or handed to the Accounting / Resources Manger 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 Accounting/Resources Manager or Headteacher.

#### 3.2 Giving of Gifts

The Academy encourages and seeks cooperative relationships between staff, governors, stakeholders and external organisations. Accordingly there can be occasions where it is appropriate for the Academy to provide and fund limited gifts, in particular hospitality, which will principally be dealt with through the in-house catering facilities. Occasionally it may be appropriate for gifts to be provided for i) exchange visits ii) leaving gifts to staff leaving the employment of the Academy. In respect of leaving gifts these are often supplemented with private contributions from continuing members of staff.

All gifts are to be pre-authorised by the Headteacher or Accounting/Resources Manager and must not exceed £25 in value.

### 3.3 Hospitality

A gauge of what is acceptable in terms of hospitality is whether this Academy 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 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 Headteacher 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 Academy is considering buying, you should ensure that expenses of the trip are paid by the Academy. Acceptance of refreshments and/or a working lunch may be acceptable, but care must be taken to ensure that the Academy'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 Academy must be agreed in advance with a Headteacher. 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 Academy.



#### **4. Business and Pecuniary 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 for entry into the Register of Business Interests. Business and Pecuniary Interest declarations must be completed by all staff once a year. However, any relevant personal interest which emerges in the interim must be declared in writing immediately.

#### **5. Confidentiality and Safeguards**

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. The Academy will not tolerate harassment or victimisation and will do what it lawfully can to protect an individual when a concern is raised in good faith

#### **6. Links with other Policies**

The Governing Body is committed to preventing fraud and corruption. To help achieve this objective there is a clear network of systems and procedures in place for the prevention, detection and investigation of fraud and corruption. This Gifts and Hospitality policy attempts to consolidate those in one document and should be read in conjunction with the following Academy policies:

- Financial Regulations
- Anti Fraud and Corruption
- Business and Pecuniary Interest
- Whistleblowing