



# Gifts and Hospitality Policy

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Together we **Exceed**



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## 1. Introduction

- 1.1 Exceed Academies Trust is committed to the values of probity and accountability. All members, trustees, staff and local governors should conduct themselves with integrity, impartiality and honesty at all times. Staff should maintain high standards of propriety and professionalism.
- 1.2 The guiding principles are:
- The conduct of individuals should not create suspicion of any conflict between their official duty and their private interest.
  - The action of individuals acting in an official capacity should not give the impression to any member of the public, to any organisation with whom they deal or to their colleagues that they have been (or may have been) influenced by a benefit to show favour or disfavour to any person or organisation.

## 2. Purpose and Scope

- 2.1 This policy applies to all Members, Trustees, Local Governors and all members of staff. For the purposes of this document, 'staff' applies to all staff, at Academy and Trust level, members, trustees and local governors. Procedures apply to gifts from pupils/students and their families as well as from potential suppliers.
- 2.2 Hospitality received from or the giving of hospitality to a third party is generally not acceptable. The exception to this general principle is where there is a genuine need for the development of legitimate and ethically sound business relationships and the hospitality offered will genuinely assist the development of this.
- 2.3 Even then only modest hospitality is acceptable AND the following procedures must be complied with at all times. Any gift or hospitality over the value of £25 needs to be declared.

## 3. Definitions

- 3.1 For the purpose of this policy:
- "hospitality" means any form of gift, entertainment, personal reward or favour or anything of value;
  - "modest" means low cost and moderate frequency and level;
  - "trivial" means a very small low value item such as a calendar, pen, a small box of chocolates or a very small promotional item.

## 4. Hospitality

- 4.1 Hospitality can take a variety of forms, some of which staff may accept, some of which should be declined.
- 4.2 Staff may be offered hospitality as a normal business practice in a way that is directly linked to their role. Examples of this kind of hospitality include the offer of refreshments at business meetings or the offer of lunch or dinner at the end of an official engagement. This kind of conventional hospitality may be accepted.

- 4.3 It may be appropriate for the Trust or an academy to provide a celebratory meal or business event in keeping with the ethos of Exceed Academies Trust to celebrate achievements and / or hard work. In approving such events, the CEO and CFO will give due consideration to both rules on personal taxation from HMRC and the requirements to properly utilise public funds. For example, staff events should be available to all staff in a location, and in aggregate should not breach the HMRC regulations of £150 per person per annum. Event budgets should not exceed £25 per head. These do not need to be added to the register but will be monitored by the CFO / CEO to ensure they are at a reasonable level.
- 4.4 Staff may also be offered other forms of hospitality which are not related to their role and are not linked to Trust or Academy business. This might include substantial offers of social functions, travel or accommodation, offers of tickets and invitations to sporting, cultural or social events. These forms of hospitality should be declined.
- 4.5 If any member of staff is in doubt about whether it is appropriate to accept any offer of hospitality, the advice of the Chief Financial Officer and/or Governance Manager should be sought.
- 4.6 Staff must never canvas or seek gifts or hospitality.

## 5. Gifts

- 5.1 Staff should not accept gifts or rewards from any organisation or individual with whom they have contact in the course of their work as an inducement either for doing something or not doing something in their official capacity. Particular care should be taken about any gift from a person or organisation which has, or is hoping to have, a contract with the Trust or the Academy. Gifts of a trivial or inexpensive nature may be accepted (e.g. diaries, calendars), but more substantial or expensive offerings should be declined.
- 5.2 Gifts are deemed to include:
- Goods provided for personal or other private use;
  - Personal services;
  - Loans of equipment, vehicles etc. for personal use;
  - The provision of goods / services at preferential cost for personal or other private use.
- 5.3 If unsolicited gifts of a substantial nature arrive from contractors they should be returned with a polite explanation that the Trust's policies do not allow their acceptance.
- 5.4 Modest gifts to teachers/support staff from parents of pupils can be accepted provided it is given in good faith and is not seen as an attempt to gain advantage. Substantial or expensive gifts should be politely declined advising that the Trust's policies do not allow their acceptance. Staff may accept gift vouchers from parents; however, in line with this policy, anything over the value of £25 needs to be declared. *Where the value of a gift is unknown but there is potential for it to be of a greater value than £25, it is recommended that staff complete a declaration.*
- 5.5 ***Staff should not accept cash under any circumstance.***

## 6. Gifts and Hospitality Offered by Exceed Academies Trust

- 6.1 Staff must be mindful that the value of all gifts and hospitality offered by the Trust are sourced from public funding, and the expectation is that such funding will be used for legitimate purposes and demonstrate value for money.

6.2 To achieve propriety in the use of public funds, gifts for members of staff who are leaving or have a personal celebration should only be bought with voluntary contributions from colleagues.

6.3 In exceptional circumstances it may be appropriate for the Trust to provide a gift of up to £50.00 in value, for example:

- providing a bouquet of flowers to a seriously ill employee, or to a longstanding employee who is retiring;
- giving a box of chocolates to someone who has provided services free of charge.

*It may be appropriate to consider a charitable donation through voluntary contributions instead.*

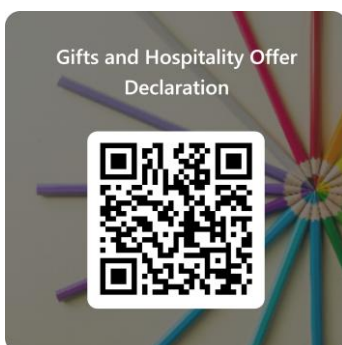
6.4 Alcohol must never be purchased as gifts under any circumstances.

6.5 It is acceptable for Exceed Academies Trust to provide modest hospitality in the way of working lunches and/or dinners to existing and potential contractors and stakeholders subject to a genuine business reason.

## 7. Registration of Gifts and Hospitality

7.1 Members, Trustees, Local Governors and all staff must record being offered or accepting any gifts by making a declaration to the Governance Manager. The Governance Manager will maintain a register of gifts and hospitality for the Trust. It will be the responsibility of individuals to notify the registrar of all gifts and hospitality offered/received in line with this policy.

7.2 Staff should make a declaration as soon as possible after the offer or receipt of gifts or hospitality. Staff must make declarations by completing and submitting the “Gifts and Hospitality Offer Declaration” Microsoft Form. It is recommended that they retain a copy of the completed declaration for their personal records. To access the declaration form, please scan the QR code below or use this link: <https://forms.office.com/e/utXhrT7LUu>.



7.3 Declarations must include the following information:

- the recipient’s name, position and associated school/organisation within the Trust;
- date of offer of gift or hospitality;
- who offered the gift;
- description of the gift or hospitality offered;
- reason given for offering the gift or hospitality;
- estimated value of the gift or hospitality;
- whether the gift or hospitality was accepted or declined.

For example:

<b>Date received</b>	<b>Recipient (Name, position &amp; school)</b>	<b>Received from (Name / organisation)</b>	<b>Description of Gift/ Hospitality offered</b>	<b>Value £ (Estimate if unknown)</b>	<b>Reason given for providing gift/hospitality</b>	<b>Accepted or Declined</b>
1 March 2021	Mickey Mouse, Headteacher, Disney School	Scrooge McDuck (McDuck Enterprises)	Desktop Printer	Approx. £80.00	Sent with tender for printing services	Declined

7.3 You should consult the Chief Finance Officer or the Governance Manager for any guidance required on this Policy. *In general terms, if you have any doubt about whether an item should or should not be declared, you are advised to declare it.*

## 8. Policy Breach

8.1 Staff who fail to declare the acceptance/provision/decline of hospitality and gifts in accordance with this Policy may be subject to disciplinary action under the Trust's Disciplinary Policy.