

## GIFTS & HOSPITALITY POLICY

<b>Prepared By</b>	Chief Financial Officer
<b>Approved By</b>	Hamwic Education Trust Board of Directors
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## GIFTS & HOSPITALITY POLICY

This document defines the instances in which the receipt or provision of gifts and hospitality is acceptable.

For the purpose of this document, all references to the Trust refers to Hamwic Education Trust, Hamwic Trust and all associated multi-academy trusts & academies (the Trust). The definition of staff includes all staff working for the Trust as well as staff in academies operating within the Trust.

### **Introduction:**

The Trust is committed to ensuring that it can demonstrate that no undue or improper influence has been applied, or could be perceived to have been applied, by any supplier or other individual/body dealing with the Trust.

All staff involved with the Trust have a responsibility to ensure that the above statement holds true when dealing with suppliers or any other individual/body.

Any member of staff accepting a gift, hospitality or other personal benefit outside of those allowed within this document may be subject to the Trust's Disciplinary Policy.

### **Policy Statement:**

The Trust aims to be an honest and ethical institution. As such, the acceptance of gifts, hospitality or other personal benefit must not be accepted or offered by any member of staff, with the exceptions noted below.

### **The Receipt of Gifts, Hospitality or Other Personal Benefit**

The following general rules apply to the receipt of gifts, hospitality or other personal benefit;

- Staff may accept small 'thank you' gifts of token value amounting to no more than £30.
- Staff must always say no if they believe that the provider of the gift has an ulterior motive. Staff must be sensitive to the possibility that the provider of the gift may think that even small gifts or simple hospitality will elicit a more prompt service or preferential treatment.
- Staff must never accept a gift, hospitality or other personal benefit from anyone who is, or may be in the foreseeable future, tendering for any contract with the Trust, seeking employment with the Trust or is in dispute with the Trust, even if they are not directly involved in that service area or academy.
- Where items purchased for the Trust include a free gift, such gifts must be used for Trust business.
- If there is any doubt about the acceptability of any gift, offer of hospitality or other personal benefit, it is the responsibility of staff to consult with the Chief Financial Officer.
- Staff may accept the offer of hospitality with customers, suppliers or other individuals/bodies, provided they are not at an unreasonable level of cost.
- Invitations to corporate hospitality events must each be judged on their merit, subject to the above rule. Consideration should be given to the number of these events attended with consideration taken as to what public perception may be.
- Paid holidays or concessionary travel rates must not be accepted. Neither are offers of hotel accommodation or the use of company apartments.
- If visiting a company to view equipment that the Trust is considering purchasing, staff should ensure that expenses for the trip are paid for 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 tendering procedures are not compromised.

- Acceptance of sponsored hospitality that is built into the official programme of conferences and seminars related to work are acceptable.
- Offers to speak at corporate dinners and networking events, or events organised by a third party, where there is a genuine need to impart information or represent the Trust must be agreed in advance with the Chief Financial Officer. Where a spouse or partner of a staff member is included in the invitation, and approval has been granted, it will be acceptable for that person to attend, but if expenses are incurred, these must be met personally and not incurred by the Trust. Any invitation accepted should be made in the professional capacity of the staff member, as a representative of the Trust.

### **The Provision of Gifts, Hospitality or Other Personal Benefit**

The Trust encourages and seeks cooperative relationships between staff, governors, directors, other stakeholders and external organisations. Accordingly, it is acceptable for the Trust to provide for gifts of a token nature, amounting to no more than £30. Such gifts should be supplemented with private contributions from continuing members of staff.

### **Recording Gifts Received or Provided**

All gifts must be recorded on the following registers:

- “Gifts Received Register” – for gifts, hospitality or other personal benefit received by staff.
- “Gifts Provided Register” – for gifts, hospitality or other personal benefit provided by the Trust.

Academies must utilise the templates provided in this document.



