

The Great Schools Trust



Gifts and Hospitality Policy

Approved by the Trust Board on 06/02/2020

Applicable from 07/02/2020

The Great Schools Trust Gifts & Hospitality Policy

Introduction

This policy outlines the approach approved by the Great Schools Trust (the Trust) relating to the acceptance by directors, staff and governors of gifts and hospitality of whatever nature from outside the Trust, whether from individuals or organisations. The policy also outlines the approved approach to the offering of gifts and hospitality by the Trust.

Within the terms of the policy, directors, staff and governors are expected to exercise common sense. If they are in any doubt they must consult the CEO / Chief Finance Officer / Academy Principal and, in every case, declare the offer or acceptance of a gift using the Trust's 'Declaration of Gifts and Hospitality' form, subject to the defined minimum level (see Appendices 1 and 2).

The process set out is designed to safeguard directors, governors and staff from any misunderstanding or criticism. The general principles which govern gifts and hospitality are:

- Offers of hospitality should only be accepted if there is a genuine need to represent the Trust.
- Gifts should only be accepted in exceptional circumstances.
- The policy applies to all directors, governors and staff of the Trust.
- Registers will be made accessible to the CEO / CFO / Principals / governors and directors. They will also be available for inspection by external and internal auditors as required.
- Any request by a member of the public to view the Register of Gifts and Hospitality will be referred to the CEO. In considering any request, the requirement for the Trust to be open and honest will be considered, along with the provision of appropriate legislation, including the Data Protection Act 1998.

Hospitality

The following principles should be followed in deciding whether or not to accept hospitality:

- Whether members of the public, knowing the facts of the situation, could reasonably think that they might be influenced by the hospitality offered. If the answer is yes, the hospitality should be declined.
- In making judgments, relevant facts to take into account include the person or organisation offering the hospitality, its scale and nature, and its timing in relation to decisions to be made by the Trust / academy.
- Care should be taken to avoid situations in which an individual director, governor or member of staff is the sole person invited to partake of hospitality or where it creates a pattern of receiving hospitality from that organisation.

Examples of when it may be proper to accept hospitality (always depending upon the particular circumstances) include:

- Attendance at conferences, events and demonstrations of equipment organised by outside bodies where there is a demonstrable interest or business case for the Trust's / academy's participation.
- Attendance at events or functions where there is a demonstrable need for the Trust / academy to be represented to either give or to receive information or to participate as part of the Trust's / academy's corporate image.
- Attendance at events or functions which are part of the civic, cultural or sporting life of the Trust / academy, including events arranged by the Trust / Sponsor.

- Working lunches where this is an appropriate and effective way of conducting business and the refreshments provided are not disproportionate.

Overnight hospitality linked to any of the above should be declared to the Trust CEO / CFO / Principal before being accepted.

Gifts

All personal gifts should be refused, donated to charity or subject to a staff raffle (Christmas gifts only) unless they come within one of the following categories:

- Modest gifts of a promotional character, e.g. calendars, diaries and other similar articles.
- Gifts on the conclusion of any courtesy visit to or from an outside organisation, providing these are of a sort normally given by that organisation
- Gifts to teachers from parents of pupils up to £30
- Gifts up to £10 in value

Gifts which are intended for The Great Schools Trust, or any of its constituent academies, may be accepted but must not be retained by the individual who receives them on behalf of these bodies. Such gifts should be forwarded as appropriate.

Link to Procurement

The Trust's Financial Regulations define the required approach to procurement. It is vitally important that procurement decisions are made and can be demonstrated to have been made purely on the basis of a robust process. Any offers of gifts and hospitality in such circumstances should be agreed prior to acceptance with the CEO / CFO / Principal

Registration of Gifts and Hospitality

All staff and governors must, within 14 days of accepting any gift or hospitality (subject to a de minimis limit of £10), provide written notification to the CEO / CFO / Principal using the 'Gifts and Hospitality' form (Appendix 1). All offers should be recorded, whether accepted or not.

The Gifts and Hospitality forms must be completed in full, setting out full details of the offer or the gift and or hospitality offered or received.

The completed forms will be retained at each academy by the Principal for 7 years and a copy to be sent to the CFO annually (see "Monitoring", below).

Giving Gifts and Hospitality

The Trust and its academies will not normally give gifts to other individuals or organisations. If gifts are given, staff must ensure that the decision is fully documented in the Gift and Hospitality Register (Appendix 2) and has regard to the propriety and regularity of the use of public funds.

Exclusions:

This does not apply to:

- the award of gifts, prizes, etc. related to the achievement of pupils e.g. attainment or merit awards, nor Trust-wide staff recognition events or activities.

- recognition awards/gifts to staff for specific areas of work or activity. Such awards must be in line with those allowed by academy arrangements operating within the Trust's Reward and

Recognition Scheme.

Expenditure on staff wellbeing (flowers, leaving gifts, etc.) should be recorded in the template at Appendix 2 and posted as staff hospitality or staff wellbeing in the accounting system.

Charitable donations e.g. instead of flowers for a funeral or matching amounts raised by students, should be of a de-minimis level in order to comply with the Trust's objects.

Where hospitality is provided by the Trust this should be approved in advance by the CEO / CFO / Principal. In approving hospitality the CEO / CFO / Principal should ensure it is not in breach of the UK Bribery Act 2010 and also that the costs are appropriate for a publicly funded organisation.

Hospitality such as working lunches, coffees, catering on training courses and modest hospitality in the form of meals, etc. are perfectly acceptable where it is appropriate to offer or receive these in support of good relationships with visiting staff or business colleagues (but not for their family or friends). These would not be added to the register but would be approved by the CEO / CFO / Principal to ensure they are of a reasonable level. Hospitality provided above this level should be recorded in the register.

Staff – meals and other refreshments

As for academy visitors above, working lunches are perfectly acceptable. In exceptional circumstances it may be appropriate for the Trust or its academies to provide a celebratory meal or event. Such expenditure would need to be funded via the sponsor's donation to the Trust and would be sanctioned by the CEO unless the CEO was a beneficiary of such an event in which case approval would be required from the Chair of the Board. In approving such an event consideration will be given to both rules on personal taxation from HMRC and the requirement to properly utilise public funds.

Expenditure of this type will be separately reported to the Audit and Risk Committee within the annual report (see "Monitoring", below).

Monitoring

The Trust Finance Director shall maintain a Trust-wide register of all gifts and hospitality and this will be available for inspection by the Trust Audit and Risk Committee and reported to the Committee on an annual basis.

Compliance with this policy

All appropriate disciplinary procedures may be applied where it is found, or reasonably suspected, that a breach of this policy has been committed by any director, governor or member of staff within the Trust / an academy. Any such breaches shall be notified promptly to the CEO / CFO / Principal.

If it is found, or reasonably supposed, that a criminal offence has been committed the matter will be reported to the appropriate authorities by the Trust, in addition to any relevant internal procedures.

Review

This policy will be reviewed at least every three years.