



ACET - GIFTS AND HOSPITALITY POLICY			
DOCUMENT CONTROL			
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Business Lead	CFO	Author	CFO
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1. Introduction

- 1.1 This policy is based on the Academy Trust Handbook, which states that academy trusts should have a policy and register on the acceptance of gifts, hospitality, awards, prizes or any other benefit which might be seen to compromise the personal judgement or integrity of staff, governors and trustees and/or any other representative of the Trust. It states that the Trust should ensure that all staff, governors and trustees are aware of this policy.

This policy also complies with our funding agreement and articles of association.

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

- 1.2 The intention of the policy is to ensure that the Trust 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 Trust. The Trust should be able to show that all decisions are reached on the basis of value for money and for no other reason.
- 1.3 Any breach of this policy could lead to disciplinary action and may constitute gross misconduct.

2. General

- 2.1 Staff, governors and trustees shall not use their authority or office for personal gain and shall seek to uphold and enhance the standing of the Trust by:
- maintaining an unimpeachable standard of honesty and integrity in all their business relationships
 - complying with the letter and spirit of the law in contractual obligations, rejecting any business practice that might be deemed improper
 - at all times in their business relationships, act to maintain the interests and good reputation of the Trust
- 2.2 Any employee who becomes aware of a breach of policy must either report this immediately to the CFO who will instigate investigations as necessary, or refer to the Trust's Whistle Blowing Policy.
- 2.3 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 Trust in any matter relevant to an employee's duties (such as conflicting business interests) should be declared in writing. Any member of staff, governor or trustee who is aware of any business dealings conferring personal gain, or involving relatives or associates of members of the Trust must supply details of such transactions to the CFO for entry into the Register of Business Interests.
- 2.4 Staff, governors and trustees may accept gifts and hospitality that have a value up to £35. These do not have to be pre-approved or recorded on the gifts and hospitality register (Annexe 1).

Generally, gifts of nominal value, such as small tokens of appreciation, may be accepted. If in any doubt, staff, governors and trustees must consult the CFO.

Similarly, hospitality such as working lunches may be accepted in order to maintain good relationships with key contacts, provided the hospitality is reasonable in the circumstances. If in doubt, guidance must be sought from the CFO.

Any gifts or hospitality offered with a value over £35 must be recorded on the gifts and hospitality register within 7 working days, even if declined. Any trustee, governor or member of staff who is offered such gifts or hospitality must consult the CFO before accepting.

If the CFO is the recipient, or intended recipient, of **any** offer of gifts or hospitality, they must inform the CEO and record the offer on the gifts and hospitality register.

Failure to declare any offer of gifts or hospitality on the register in line with this policy will be treated as a staff disciplinary matter.

2.5 Where purchased items include a "free gift", such a gift should be either used for Trust business or handed to the Trust to be used at charity raffles, pupil prizes, etc.

2.6 The following must never be offered or accepted:

- Monetary gifts
- Gifts or hospitality offered to family members, partners or close friends of staff, governors or trustees
- Gifts or hospitality from a potential supplier or tenderer in the immediate period before a tenders are invited or during the tendering process
- Lavish or extravagant gifts or hospitality, even if they relate to activities the intended recipient undertakes in their own time

This list is not intended to be exhaustive.

2.7 In relation to conventional hospitality (lunches, outings, tickets for events, etc) these may be accepted provided that it is normal and reasonable in the circumstances. However, invitations for the following should not be accepted:

- where there is no reasonable business justification for doing so; and
- where an invitation is disproportionately generous; and
- where the invitation could be seen as an inducement to affect a business decision.

2.8 Any hospitality other than of a nominal value (estimate of £50.00) or facilities provided during the normal course of business, should be reported to the CFO for entry into the Register of Business Interests.

