

GIFTS & HOSPITALITY POLICY



The People's Learning Trust: Gifts & Hospitality Policy

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GIFTS & HOSPITALITY POLICY



Contents:

1. INTRODUCTION	3
2. AIMS	3
3. WHO IS RESPONSIBLE FOR THIS POLICY?	4
4. PROCESS, ROLES & RESPONSIBILITIES	4
5. GIVING GIFTS & HOSPITALITY	6
6. EQUALITY IMPACT ASSESSMENT	7
7. RACE DISPARITY AUDIT	7
8. MONITORING, EVALUATION & REVIEW	7
9. COMPLIANCE WITH THIS POLICY	8
10. LINKED POLICIES	8
11. OTHER RELATED DOCUMENTS	8
APPENDIX 1	9
APPENDIX 2	10



GIFTS & HOSPITALITY POLICY



1. INTRODUCTION

This policy outlines the approach approved by The People's Learning Trust (the Trust) relating to the acceptance by Members, Trustees (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.

2. AIMS

Within the terms of the policy, Members, Trustees (Directors), Staff and Governors are expected to exercise common sense. If they are in any doubt they must consult the Chief Finance & Operating Officer (CFOO) (central Trust staff), Headteacher (academy staff) or the Chair of the Audit & Risk Committee (Members or Trustees), 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 attached).

The process set out is designed to safeguard all parties 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 Members, Trustees (Directors), Staff and Governors of the Trust;
- Registers will be made accessible to the Board of Trustees, the CFOO, Headteachers, Governors and Directors. They will also be available for inspection by external and internal auditors as required; and
- Any request by a member of the public to view the Register of Gifts and Hospitality will be referred to the Trust Board. 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 2018.

GIFTS & HOSPITALITY POLICY

3. WHO IS RESPONSIBLE FOR THIS POLICY?

The Trust has overall responsibility for the effective operation of this policy and for ensuring compliance with the relevant statutory framework or Trust framework. The Trust has delegated day-to-day responsibility for operating the policy to the CFOO and Headteachers of each academy.

The Local Governing Board (LGB) and Senior Leadership Team at each academy has a specific responsibility to ensure the fair application of this policy and all members of staff are responsible for supporting colleagues and ensuring its success.

4. PROCESS, ROLES & RESPONSIBILITIES

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; and
- Care should be taken to avoid situations in which an individual Member, Trustee, 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;

GIFTS & HOSPITALITY POLICY

- 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; and
- 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 CEO, CFOO or Headteacher 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, pens, sweets, 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;
- Individual gifts to teachers from parents of pupils up to £30; and
- Gifts up to £10 in value.

Gifts which are intended for the 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.

Registration of Gifts and Hospitality

All Members, Trustees, Staff and Governors must, within 14 days of accepting any gift or hospitality from an external body (subject to limits mentioned above), provide written notification to the CFOO (central Trust staff, Headteachers, Trustees and Members) or Headteacher (academy Staff and Governors) 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 Headteacher for 7 years and a copy must be sent to the CFOO annually (see "Monitoring", below).

Central Trust Staff and Headteacher forms will be retained by the CFOO.

GIFTS & HOSPITALITY POLICY

5. GIVING GIFTS & 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.

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

Charitable donations e.g. instead of flowers for a funeral or matching amounts raised by students, should be of a de Minimis level (£10) to comply with the Trust's objects.

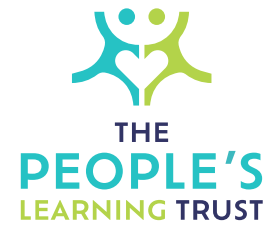
Where hospitality is provided by the Trust or individual academies this should be approved in advance by the CFOO or Headteacher. In approving hospitality, the CFOO or Headteacher should ensure it is not in breach of the UK Bribery Act 2010 and also that the costs are appropriate for a publicly funded 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 CFOO or Headteacher to ensure they are of a reasonable level. Hospitality provided above this level should be recorded in the register as '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. This would be sanctioned by the Chair of the Audit & Risk Committee (central Trust).

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.

GIFTS & HOSPITALITY POLICY



6. EQUALITY IMPACT ASSESSMENT

Under the Equality Act 2010 we have a duty not to discriminate against people on the basis of their age, disability, gender, gender identity, pregnancy or maternity, race, religion or belief and sexual orientation.

This policy has been equality impact assessed, and we believe that it is in line with the Equality Act 2010 as it is fair, it does not prioritise or disadvantage any pupil and it helps to promote equality across the Trust.

7. RACE DISPARITY AUDIT

We acknowledge the findings of the Race Disparity Audit that clearly shows how people of different ethnicities are treated across the public services of health, education, employment and the criminal justice system.

The educational section of the audit that covers differences by region; attainment and economic disadvantage; exclusions and abuse; and destinations, has a significant importance for the strategic planning of this Trust.

8. MONITORING, EVALUATION & REVIEW

Academies are required to complete the relevant declaration of hospitality and gifts form (see **Appendix 1 and 2**) and ensure that they are recorded on the Trust-wide gifts and hospitality register throughout the year.

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

The policy will be promoted and implemented throughout all Trust academies. The Trust will monitor the operation and effectiveness of arrangements referred to in this policy at each academy.

The Trust will review this policy every two years in consultation with the Risk & Audit Committee.

A statement of the policy's effectiveness and the necessary recommendations for improvement will be presented to the Trust Board for further discussion and endorsement if required.

GIFTS & HOSPITALITY POLICY



9. 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 Trustee, governor or member of staff within the Trust / an academy. Any such breaches shall be notified promptly to the CEO, Chief Finance Officer or 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.

10. LINKED POLICIES

This Gifts and Hospitality policy should be read in conjunction with the following Trust and academy policies:

- Anti-Fraud and Anti-Bribery Policy
- Staff Code of Conduct
- Finance Policy
- Disciplinary Policy
- Equality and Diversity Policy
- Expenses Policies

11. OTHER RELATED DOCUMENTS

This policy should be a working document that is fit for purpose. It represents the Trust's ethos and enables consistency and quality across the Trust. It is also related to the following legislation:

- Trust Articles of Association
- Funding Agreements
- Academy Trust Handbook

GIFTS & HOSPITALITY POLICY

APPENDIX 1

Declaration of Gifts and Hospitality - receipt

Name: _____ Place of work: _____

Job title: _____

Description of gift / hospitality	Offered by (organisation)	Date of receipt	Did you accept the item? (Y/N)	Approximate value (£)

I certify that I have listed above all gifts and hospitality which need to be declared under the terms of the Trust's Gifts & Hospitality Policy (with an estimated value in excess of £10).

Signed: _____

Date: _____

GIFTS & HOSPITALITY POLICY

APPENDIX 2

Declaration of Gifts and Hospitality – given by the Trust

Name: _____ Place of work: _____

Job Title: _____

Description of gift / hospitality	Offered to (organisation)	Approved (CFO / Principal)	Date of receipt	Did you accept the item? (Y/N)	Approximate value (£)

I certify that I have listed above all gifts and hospitality which need to be declared under the terms of the Trust's Gifts & Hospitality Policy that I have offered on behalf of the Trust in connection with my role (with an estimated value in excess of £10)

Signed: _____

Date: _____