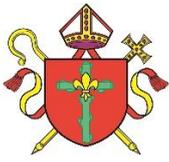


## **St Thérèse of Lisieux Catholic Multi Academy Trust**

### **Gifts and Hospitality Policy**

**October 2019**

<b>Audience:</b>	<b>Central Team and all other CMAT employees</b>
<b>Approved:</b>	<b>Directors – 14/10/2019</b>
<b>Policy Owner:</b>	<b>Louise Wilson – Chief Executive Officer</b>
<b>Policy Model:</b>	<b>Compliance – all CMAT academies use this policy</b>
<b>Review:</b>	<b>3 Yearly</b>
<b>Version Number:</b>	<b>1.0 (October 2019)</b>



### **Scope of this policy**

This policy applies to all academies within St Thérèse of Lisieux Catholic Multi Academy Trust (The Trust).

### **Objective of this policy**

The objectives of this policy are:

- to ensure that The Trust can demonstrate that no undue influence has been applied by any person or organisation in its business transactions; and
- to set clear guidelines for staff regarding accepting and giving of gifts and hospitality

### **Ownership of this policy**

This policy is owned by The Trust's Finance and Estates Committee. Each academy will adopt this policy.

### **Monitoring of this policy**

The Finance Director will implement this policy across the Trust on a day to day basis and a statement will be issued in the Annual Report and Accounts reporting on the key performance measures in this policy. Each academy will maintain a Gifts and Hospitality Register available for inspection at any time.

### **Relevant legislation**

This policy is a requirement of the Academies Financial Handbook.

### **Related policies/documents**

Competitive Tendering Policy  
Finance Regulations Manual



## Policy details

### 1 Introduction

1.1 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. Any consideration of whether or not the principles of this Policy have been breached will be determined by reference to this provision.

1.2 Any breach of this Policy could lead to disciplinary action and may constitute gross misconduct.

1.3 Policies and procedures implemented by the Trust are there to control the organisation's exposure to risks in line with the Risk Policy and those identified within the risk register. All staff should be made aware of this and all policies of the Trust and the procedures in place including any updates issued from time to time. Should staff have any queries relating to this or any other policy or procedure they should write to the Trust's Governance Manager who will ensure adequate training and guidance is provided.

### 2 General Principles

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

2.2 The Trust and all academies will be open and transparent in declaring all offers of gifts and hospitality whether or not accepted. A full record will be made in the Gifts and Hospitality Register. See Appendix I for a suggested template.

### 3 Definitions

3.1 A Gift is any item or service, award, prize or any other benefit which is received free of charge; or personally offered at a discounted rate or on terms not available to the general public or which might be seen to compromise the personal judgment or integrity of the recipient.

3.2 Hospitality is the offer of food, drink, accommodation or entertainment or the opportunity to attend any cultural or sporting event not available to the general public.

### 4 Dealing with Gifts and Hospitality

4.1 The Trust expects staff, directors and governors to exercise the utmost discretion in giving and accepting gifts and hospitality when on Trust or academy business. Particular care should be taken about a gift from a person or organisation that has, or is hoping to have, a contract with our organisation. In any case of doubt advice should be sought from the Headteacher or Trust Finance Director.

4.2 Staff, directors and governors must not make use of their official position to further their private interests or those of others.

4.3 Staff, directors and governors must not accept gifts, hospitality or benefits of any kind from a third party where it might be perceived that their personal integrity is being compromised, or that the Trust / academy might be placed under an obligation.

4.4 Gifts of low intrinsic value (not more than £10) such as promotional calendars or diaries, or small tokens of gratitude, can be accepted. If there is any doubt as to whether the acceptance of such an item is appropriate, individuals should decline the gift or refer the matter to the Trust Finance Director.

4.5 It is common for appreciative parents and pupils to register their thanks for the work of staff in the form of a small personal gift. If these are valued at less than £30 these are perfectly acceptable without reference to senior members of staff. These will not need to be recorded in the register. Where gifts valued over £30 are accepted, these should be recorded in the register.



4.6 Where a more valuable gift, benefit or service is offered which is to the good of the academy, rather than an individual, it must be referred to the Headteacher or to the Trust Finance Director for approval within their discretion; if acceptable, these items must be recorded in the register.

4.7 Hospitality such as working lunches, coffees etc are perfectly acceptable where it is appropriate to offer or receive these in support of good relationships with visiting staff or business colleagues. Modest hospitality, provided it is reasonable in the circumstances, should be similar to the scale of hospitality which the Trust as an employer would be likely to offer. These would not be added to the register. Hospitality received above this level should be recorded in the register.

4.8 If a member of staff, director or governor is offered a gift or hospitality whilst involved in the procurement of goods and services, tenders for work or when liaising with anyone conducting business with The Trust (other than light refreshments) it is their responsibility to discuss this with the Trust Finance Director immediately.

4.9 If not accepting a gift would be regarded as causing offence (such as a sudden and unexpected gift or one where refusal could cause cultural offence) the item should be accepted. The matter should then be brought to the attention of the Trust Finance Director as soon as possible who may decide to return the gift, or may donate it to a Trust raffle/ fair or a charitable cause.

4.10 Examples of gifts or hospitality that should not be accepted are:

- cash or monetary gifts;
- gifts or hospitality offers to a member of your family;
- gifts or hospitality from a potential supplier or tenderer in the immediate period before tenders are invited or during the tender process;
- staff, director or governor attendance at sporting and cultural events at the invitation of suppliers, potential suppliers or consultants. (Where it is considered that there is a benefit to the Trust or one of its academies in a member of staff, trustee or governor attending a sponsored event, the attendance must be formally approved and registered by the Trust Finance Director).

4.11 Where a gift is received on behalf of The Trust, the gift remains the property of The Trust. The gift may be required for display it may, with the Headteacher's approval, remain in the care of the recipient. Unless otherwise agreed, the gift should be returned to The Trust on or before the recipient's last working day.

4.12 Where gifts in the form of sponsorship of a Trust event are made then full details must be entered in the Gifts and Hospitality Register.

4.13 Gifts are sometimes offered by suppliers with the purchase of items. All such special offer gifts are the property of The Trust and must be used accordingly.

## **5 Giving Gifts and Hospitality**

5.1 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 and has regard to the propriety and regularity of the use of public funds. This does not apply to the award of gifts, prizes etc related to the achievement of pupils eg attainment or merit awards.

5.2 Where hospitality is provided by the Trust or its academies this should be approved in advance by the Finance Director or Headteacher. In approving hospitality the Finance Director or Headteacher should ensure it is not in breach of the UK Bribery Act 2010 and also that the costs are appropriate for a publically funded organisation. Hospitality such as working lunches, coffees etc and modest hospitality in the form of meals etc are 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. Hospitality provided above this level should be recorded in the register.

5.3 Gifts provided by the Trust or its academies outside of those covered above (eg gifts to clergy, the Nottingham Roman Catholic Diocese and charitable donations) must be provided for out of general fund raising and not from public funds. Full records will be maintained of these gifts and donations in the Gifts and Hospitality Register.

## **6 Non Compliance**

6.1 In the case where it is believed a member of staff, director or governor has not declared a gift or hospitality then a formal investigation will be instigated by the Chair of the Trust / Finance Director. If misconduct is indicated, this may take the form of disciplinary procedures in the case of employees.

## **7 Publication, Monitoring and Review**

7.1 This policy will be circulated to all staff, directors and governors immediately after approval and will form part of the induction pack for staff, directors and governors new to the Trust. A copy will be made available on the website at each academy. It will be reviewed by the Trust every three years.

### **Supporting Documents**

Academies Financial Handbook:

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/714474/Academies\\_Financial\\_Handbook\\_2018.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/714474/Academies_Financial_Handbook_2018.pdf)

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