



Denmark Road High School

Gifts and Hospitality Policy

Approved by:	Trust Board	Date: 5.5.2022
Signed:		Date: 5.5.2022
Last reviewed on:	April 2022	
Next review due by:	April 2025 (this policy will be reviewed every 3 years)	

Revision History

Issue Date	Changes made
April 2022	1. Previous policy reviewed and updated based on The Key model policy.

Aims

This policy aims to ensure that:

- The academy trust's funds are used only in accordance with the law, its articles of association, its funding agreement and the latest Academy Trust Handbook;
- The trust and those associated with it operate in a way that commands broad public support;
- The trust has due regard to propriety and regularity, and ensures values for money, in the use of public funds;
- Trustees fulfil their fiduciary duties and wider responsibilities as charitable trustees and company directors;
- Members, trustees and staff are aware of what constitutes acceptable gifts and hospitality, and the process that must be followed if they are presented with any of the same.

Legislation and Guidance

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 members, trustees, staff and/or any other representative of the trust. It states that the trust should ensure that all staff are aware of this policy.

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

Purpose

- The receipt of gifts, money or excessive hospitality can damage the academy trust's reputation and lead to possible prosecutions for corruption.
- This policy seeks to protect staff from suspicion of dishonesty and ensure they are free from any conflict of interest with respect to acceptance or provision of gifts, hospitality or any other inducement from or to suppliers of goods or services to the academy trust.

Definitions

- A gift is any items, cash, awards, prizes, goods or services, benefit in kind given or offered for which no payment or service was given or received in return.
- Hospitality can be defined as any food, drink, accommodation or entertainment (such as cultural or sporting events) provided free of charge or heavily discounted or on terms not generally available to the general public.
- Staff is taken to mean all permanent and fixed term staff employed by Denmark Road High School and by any other contractors, consultants or other persons (including Trustees) acting under the academy trust's name.

Roles and Responsibilities

Denmark Road High School expects members, trustees and staff to exercise the utmost discretion in giving and accepting gifts and hospitality when on academy trust business. Particular care should be taken with regard to a person or organisation that has, or is hoping to have, a contract with the academy trust.

- They must not give or accept gifts, hospitality or benefits in kind from a third party where it might be perceived that their personal integrity is being compromised or that Denmark Road High School might be placed under an obligation as a result of acceptance.
- No favour or preference which is not generally available should be sought, accepted or given.

- They must not make use of their official position to further their private interests or those of others.
- They must not solicit gifts or hospitality.

Academy Trustees

Academy trustees will ensure that the trust's funds are used in a way that commands broad public support, pays due regard to propriety and regularity, and provides value for money.

The Trust Board will approve the Gifts and Hospitality Policy.

The Headteacher

The Headteachers is responsible for ensuring that all staff are aware of and understand this policy, and that it is being implemented consistently.

The Headteacher will act with the utmost integrity on all matters relating to gifts and hospitality, ensuring that they set a good example to the rest of the school and trust and to those outside the organisation.

They will ensure, alongside the Business and Operations Manager, that decisions on whether individuals or the trust can accept or offer gifts or hospitality with a value exceeding £25 are in line with this policy.

The Business and Operations Manager

The Business and Operations Manager will ensure that:

- The trust maintains a gifts and hospitality register;
- Figures for transactions relating to gifts made by the trust are disclosed in the trust's audited accounts, in accordance with the Academy Trust Handbook;
- The academy trustees and Headteacher are provided with information on gifts and hospitality received and given, as appropriate.

They will also ensure, alongside the Headteacher, that decisions on whether individuals or the trust can accept or offer gifts or hospitality with a value exceeding £25 are in line with this policy.

The Business and Operations Manager will be responsible for ownership of the Gifts and Hospitality Policy and the review of it every three years.

The Finance Manager

The Finance Manager is responsible for maintaining the gifts and hospitality register on a day-to-day basis and ensuring it is monitored regularly.

All Staff

Individual staff are personally responsible for reporting any gifts/hospitality offered and whether these have been accepted or declined. The Finance Office will record this information in the register.

Gifts and Hospitality

- The individual should consider carefully whether it is appropriate to accept or decline a gift or hospitality.
- If in doubt advice should be sought from the Business and Operations Manager who may in turn liaise with the Headteacher.
- Any gift or hospitality with a value of £25 or over must be recorded in the gifts and hospitality register (see Appendix 1) within 7 working days, even if declined. This is held by the Finance Office.
- It is each individual's responsibility to inform the Business and Operations Manager by e-mail of any gifts or hospitality that is offered before accepting.
- If the Headteacher is the recipient, or intended recipient, of **any** offer of gifts or hospitality, they must inform the Chair of the Board of Trustees 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.

Acceptable Gifts and Hospitality

- Members, trustees and staff can accept gifts and hospitality that have a value of up to £25. These do not have to be pre-approved or recorded on the gifts and hospitality register.
- Generally, gifts of nominal value, such as small tokens of appreciation, may be accepted.
- 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.

Unacceptable Gifts and Hospitality

The following gifts must never be offered or accepted:

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

Declining Gifts and Hospitality

- Any members, trustee or staff member who is offered any of the unacceptable gifts or hospitality outlined above should politely decline the offer.
- Disciplinary action will be taken against anyone who fails to decline gifts or hospitality the trust has deemed unacceptable.

Contracts with Suppliers

- Staff must base all purchasing decisions and negotiations for contracts solely on achieving best value for money.
- Denmark Road High School requires staff who have official dealings with contractors and other suppliers of goods and services to the academy trust to avoid conducting any private business with them by any means other than through normal commercial channels.
- Staff should be aware of the Prevention of Corruption Act 1916 which states that any money, gift or consideration received by an employee in public service, from a person or organisation holding, or

seeking to obtain a contract, will be deemed by the courts to have been received corruptly unless the employee proves otherwise.

Gifts to and from Students

- Given the nature of the professional responsibilities of staff, they are strongly advised not to give or accept gifts/hospitality (exceeding £25 in value) from students during their period of study.
- Any gifts/hospitality from students, exceeding £25 in value must be entered in the gifts and hospitality register.

Gifts and Hospitality Register

The following should be recorded:

- Nature of gift/hospitality;
- Value of gift/hospitality;
- Name of person/company offering the gift/hospitality;
- Date gift/hospitality accepted/refuse;
- Name of employee.

Links with other policies

This gifts and Hospitality Policy is linked to the:

- Staff code of conduct;
- Staff disciplinary procedures;
- Accounting policy.

Appendix 1: gifts and hospitality register

DATE	NAME	DESCRIPTION OF GIFT/HOSPITALITY AND APPROXIMATE VALUE	PARTY OFFERING GIFT/HOSPITALITY	ACCEPTED/ REJECTED	APPROVED BY