



TrustEd CSAT Alliance

Gifts and Hospitality Policy

FREQUENCY OF REVIEW: Every three years

COMMITTEE: Audit

APPROVED: Spring 2021

AUTHOR: Director of Finance

DATE OF NEXT REVIEW: Spring 2024
unless there is a material change

***NB: UPDATED Post merger May 2022**

Adopted by the Board of Trustees

Signed _____ Dated _____
Chair of Trust Board

Signed _____ Dated _____
Chief Education Officer (CEO)



GIFTS AND HOSPITALITY POLICY (RECEIVING & GIVING IN EXCESS OF £30)

Gifts & Hospitality (receiving)

TrustEd CSAT Alliance is committed to raising awareness amongst Trustees, Governors, and Staff of their responsibility to be honest and act in good faith by not accepting or commissioning an advantage of any kind from those who do business with the Trust or any of its schools.

The receipt of gifts or excessive hospitality can damage the Trust's reputation. This document sets out the Trust's policy with regards to the acceptance of gifts and hospitality of whatever nature from outside individuals or organisations or from pupils or their parents/guardians.

TrustEd CSAT Alliance Trustees, Governors and Staff dealing with external organisations or individuals are encouraged to do so sympathetically, efficiently, promptly and without bias to avoid committing a criminal offence.

As part of the TrustEd CSAT Alliance commitments to openness and transparency, a Gifts & Hospitality Register is to be maintained and made available for public inspection. The Register is designed to protect both the Trust, Trustees, Governors, and staff from damaging allegations of corruption and possible punitive actions.

The policy seeks to ensure that all Trustees, Governors, and staff act with impartiality and integrity so as to avoid any suspicion of the existence of conflicts of interest.

If an allegation is made it is for the individual to demonstrate that any such rewards have not been corruptly obtained.

Definition and Scope

It is a criminal offence for any individual to corruptly receive or give any gift, loan, fee, reward, or advantage for doing, or not doing, anything or showing favour or disfavour, to any person in their official capacity.

Unlawful giving or accepting of gifts or hospitality that would amount to a criminal offence results from a motive to influence the other party or to create an obligation on the other party to reciprocate the favour.

A gift or form of hospitality may be considered inappropriate where the Trust/School or individual would be embarrassed should the proposed action become public knowledge.

Gifts include:

- goods provided for personal or other private use.
- personal services.
- loans of equipment, vehicles etc. for personal use.
- the provision of goods/services at preferential cost for personal or other private use.

Hospitality (either at zero cost or substantially reduced cost) includes the following:

- Meals and refreshments; travel opportunities; holidays; hotel or other accommodation; invitations to social, cultural or sports events.

Acceptance of Gifts and Hospitality

Offers of gifts and hospitality should **never** be accepted in situations where acceptance would place the recipient, Trust, or the school, under an obligation to the donor, or may reasonably appear to do so, or where the purpose of the offer is to influence any judgements and decisions that the recipient might be involved in making. Particular care should be taken over the offer of gifts or hospitality from a person or organisation that has, or is hoping to have, a contractual relationship with the Trust or one of its schools.

If you are in doubt about whether it is appropriate to accept any offer of gifts or hospitality the advice of the Headteacher/CEO/DCEO or Director of Finance should be sought. Trustees, Governors, and all staff are required to register the acceptance of a single gift or item of hospitality exceeding an estimated value of £30.

Any gift or hospitality given or received must be recorded in the register Gifts & Hospitality Register even if it has been refused.

Gifts to another individual or school should be made only in exceptional circumstances and with the approval of Headteacher/CEO/DCEO or Director of Finance as appropriate.

Gifts and Hospitality **may** be accepted in the following circumstances:

- items of low intrinsic value such as pens, calendars and diaries offered as advertising or promotional gifts.
- small gifts, such as flowers or boxes of chocolates, given by individuals to express gratitude for help given.
- attendance at sporting, social or cultural events where it would be usual for the school to be represented and where representatives from other schools or public bodies would be invited.
- meals and refreshments provided at business meetings, conferences, and training events.
- gifts which are intended for the school rather than an individual member of staff or Governor may, with the agreement of the Headteacher/CEO/DCEO Director of Finance, be accepted on behalf of the Trust/school and will then become the property of the Trust.

Registration of Gifts and Hospitality

In the interests of transparency and accountability a Register of Gifts and Hospitality (Appendix B) will be kept in the administration office of each Trust school and by the Trust Business Manager for Trust Central staff. Any member of staff or governor who accepts an offer from any individual or organisation or pupil or the parent(s) of a pupil of a gift or item of hospitality with an estimated value of over £30 must ensure that each gift or item of hospitality is recorded in the Register of Gifts and Hospitality.

A Declaration of Gifts and Hospitality declaration form (Appendix A) is available from the school administration office/Trust Business Manager and must be completed and submitted to the Headteacher/CEO/DCEO/Director of Finance within 28 days of acceptance of any gift or hospitality.

Gifts & Hospitality (giving)

TrustEd CSAT Alliance 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 Gifts 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 e.g. attainment or merit awards. All gifts or hospitality over the value of £30 must be recorded in the Gifts & Hospitality



register.

If any hospitality is provided by TrustEd CSAT Alliance this should be approved in advance by the Headteacher/CEO/DCEO/Director of Finance to ensure it is not in breach of the UK Bribery Act 2010 and that the costs are appropriate for a publicly funded organisation. Hospitality such as working lunches, coffees etc. 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. Hospitality provided above this level should be recorded in the register.

Review

This policy will be reviewed every 3 years by TrustEd CSAT Alliance.

Declaration of a Gift or Hospitality

Name:	Position:
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I have been offered a gift / hospitality which I have declined. I have been offered a gift / hospitality which I have accepted. ***(Please indicate by circling which one you are confirming)***

I have given a gift / hospitality. ***(Please indicate by circling which one you are confirming)***

Date and time of offer:
Place where offered:

Name of organisation/ person	Nature of interest/ gift/ hospitality	Estimated value if applicable

Reason for accepting/ declining gift/ hospitality:

Signed: _____

Date: _____

Approved by: _____ Date: _____
Headteacher/CEO/DCEO/Director of Finance - as applicable

On completion, please return this form to the Headteacher/Trust Business Manager who will keep this and record it in the Register in date order.

Date Entered in Register



APPENDIX B

Gifts and Hospitality Register (Receiving and Giving)

Date of Entry	Name of Trustee, Governor or Staff Member	Estimated Value £	Nature of Gift /Hospitality	Supplier of Gift /Hospitality	Reason for Acceptance/ Non-Acceptance	Authorised Signatory (Must be - Headteacher/CEO/ DCEO/Director of Finance (as appropriate))