



Gifts and Hospitality Policy

December 2018

1. Purpose

The purpose of this policy is to ensure that the Romero Catholic Education Trust adheres to the required standards of conduct and that there is no perceived or real risk of corruption or conflict of interest.

2. Scope

The policy applies to all employees, members, directors and local governors and should be read in conjunction with the Trust's Anti-Fraud, Corruption and Bribery Policy.

3. Definition

Gifts and hospitality can include;

- free goods or services
- goods or services at discounted prices not available to the general public
- food, drink entertainment or accommodation

4. Policy for offers received

All offers of gifts or hospitality should be treated with caution. Where a gift or hospitality could be perceived as an inducement or reward for performing Trust duties, or where acceptance of the gift or hospitality could be open to misinterpretation, it should be tactfully but firmly declined.

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

Gifts of a promotional nature, e.g. calendars, diaries and pens which are of a low monetary value i.e. less than £25 may be accepted.

All offers of gifts and hospitality of £25 or more in value, including any offers of sponsorship for training or development, whether or not they are accepted, must be recorded promptly (and no later than 28 days from the date of the offer) in a register held by the Finance Manager.

Acceptance of gifts over £25 must receive prior approval from the Executive Headteacher. Gifts will only be accepted in the following circumstances

- the offer is proportionate and reasonable;
- there is a genuine reason to accept the gift;
- there is no perceived inducement to influence;
- cash gifts are always refused;

If employees, directors/governors are in any doubt about the acceptance of a gift or hospitality they should inform the Finance Manager in advance and seek advice. Where an employee/director/governor receives an unsolicited gift or believes that a person is otherwise attempting to influence him or her, the Finance Manager should be informed immediately.

Particular care should be taken by employees/governors/directors concerned with purchasing or the award of contracts. An individual who knowingly accepts a gift or favour from a contractor or other person seeking services to or from the Trust may

put themselves at risk of a disciplinary investigation. Failure to record offers of gifts and hospitality may also be the subject of investigation.

5. Policy for providing hospitality

The Trust may provide hospitality in connection with its business where it is appropriate for the circumstances. The hospitality may be provided to:

- Directors and governing body members;
- Staff
- Representatives from firms or companies visiting the Trust
- Any other visitors connected with the business of the Trust.

The hospitality provided should be modest and not normally exceed the provision of tea/coffee/sandwiches or working lunch or dinners.

No alcohol will be provided as part of either internal or external hospitality. The ESFA is clear that alcohol purchases of any kind are inappropriate and should be treated as irregular expenditure by the Trust's external auditors

Hospitality provided outside of the Trust premises shall require the written authorisation of the Headteacher.

6. Policy for providing gifts

The Trust may occasionally provide gifts, where it can be demonstrated that the use of academy funds is appropriate and has due regard to propriety and regularity in the use of funds, for example token gifts/flowers (up to value £25) may be given to:

- volunteers or speakers to acknowledge services provided to the Trust.
- a longstanding employee who leaves
- an ill member of staff in exceptional circumstances

All gifts will require the approval of the Chief Executive and such approval will be documented. Trustees acknowledge the guidance stated in Academy Accounts Direction 2018: Trust funds will therefore not be spent on gifts which may be deemed as 'excessive'.

7. Monitoring

The register of gifts offered and received will be reviewed termly/annually by the Trust's Finance and Resources Committee.

8. Further advice can be sought from the Finance Manager.

Breach of this policy may be treated as a disciplinary offence

