

Gift and Hospitality Policy

Evolve Church Academies Trust



Approved by: [Name]

Date: [Date]

Last reviewed on: [Date]

Next review due by: [Date]

Gifts and Hospitality Policy

The purpose of this policy is to ensure that the business conducted by Evolve Church Academy Trust employees and governors is appropriate to the environment in which the schools operate and to avoid the risk of any perceived or real conflict of interest or allegation of bribery or corruption. This outlines the Trust's policy with regard to the receipt of gifts and hospitality by its staff and governors from any third parties arising from duties undertaken on behalf of the Trust or an individual School. The Trust or School must be able to show that all decisions are reached solely on the basis of value for money and are in its best interest.

The Trust is committed to ensuring that the governance of the School's is conducted in accordance with the highest standards of integrity, probity and openness. The policy applies to all governors, employees, contractors and consultants or other associated persons, agents and representatives acting in the name of, or on behalf of, or dealing with the Trust or a School within the Trust.

What is a gift?

A gift is an item or service received free of charge. It also includes goods or services offered at a discounted rate or on terms not available to the general public.

What is hospitality?

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

What gifts or hospitality can be accepted without any approval?

You can accept gifts and hospitality, which are small gestures and have an individual value of £50 or less, without the need to seek approval or formally register receipt. This can include:

- A courtesy hospitality at business lunches/dinners or attendance in an official capacity at a public function.
- Incidental promotional gifts such as calendars, diaries or pens NB: Care must always be taken to ensure that whenever such gifts or hospitality are accepted no obligation to the person or organisation in question is accepted. In cases of doubt, staff and governors should consult their Business Manager.
- Gifts from pupils / parents like mugs, chocolates, plants & vouchers.
- Donations of goods or services offered to the school under the value of £50.

What gifts or hospitality require approval and to be formally registered?

The following examples of gifts and hospitality require approval and to be formally recorded by the Executive Bursar in the Register of Gifts and Hospitality:

- Attendance as a non-paying guest of a commercial organisation or individual at a non-work related cultural or sporting event promotional gifts.
- Items from suppliers or contractors above £50 as expressions of gratitude such as boxes of chocolates or individual bottles of drink. These items will be recorded and put towards School events.
- Sponsorship/funding for activities provided by external companies.
- Free goods, services or memberships received as part of introductory deals or offers.
- Donations of goods or services offered to the school over £50.
- Gifts of money (including donations to the School).
- Free goods, services or equipment which are normally provided by a supplier to the School at a charge.

What gifts or hospitality are not acceptable?

The following examples of gifts or hospitality should be refused by staff and governors:

- Free personal membership or subscriptions (e.g. Sports clubs) offered to staff members.
- Foreign travel unless as a specific element of a business, academic or research activity approved by the Trust or School.

Any offers of gifts or hospitality falling into any of the above categories should be reported immediately to the Executive Bursar.

What should I do if I am offered a gift or hospitality?

You must ensure that all offers with a value of more than £50 are recorded in the School's Gifts and Hospitality Register. This should be done within 7 days of the offer being made.

Do I need to record offers I decline?

Yes – all offers of gifts or hospitality, which have a value of more than £50, must be recorded in the Gifts and Hospitality Register, even if you don't accept.

Can I give gifts or offer hospitality using school funds?

You may not, directly or through others, offer or give any money, gift, hospitality or other things of value to any employee or representative of any supplier, customer or other organisation, if doing so could reasonably give the appearance of influencing the organisation's relationship with the school or trust. Gifts or hospitality can be offered in the following circumstances:

- Hospitality such as working lunches or light refreshments can be provided when working with visiting staff or business colleagues.
- Gifts for school staff, or other people who may assist the school in a voluntary capacity, are only permissible where the costs and the reasons for giving gifts are justifiable and can stand up to public scrutiny. Any such gifts should be nominal (no more than £30) and subject to the approval of the Governing Body. Gifts should not, in any circumstances, include alcohol.
- A pool of refreshments such as tea, coffee, milk and sugar for consumption by staff is permitted subject to budget constraints and approval from the governing body. Staff currently contribute towards tea, coffee, sugar, milk etc and these items are entirely funded by the

staff.

What should I do if I am in doubt?

If in doubt, always speak to the head of School/Exec Head or Exec Bursar. It is your responsibility to follow the school's guidance on gifts and hospitality and to justify why you choose to accept a gift or hospitality offered to you.

What would happen if I didn't follow the guidance?

The school will take disciplinary action for failure to follow the guidance. It is also a criminal offence to demand or accept a gift or hospitality in return for influence as a part of the school. This means you could be prosecuted by the Police under the UK Bribery Act 2010.

What is the role of the Registered Keeper of the School Register of Gifts and Hospitality in relation to the Gifts and Hospitality Policy?

The Registered Keeper is responsible for ensuring that any offer or receipt of gifts, hospitality or donations to staff and governors is recorded in the School's Register of Gifts and Hospitality. They should report any possible conflict of interest arising from the offer or receipt of gifts or hospitality.

