

Trust Gifts and Hospitality Policy



St Francis of Assisi
CATHOLIC ACADEMY TRUST

St. Francis of Assisi Catholic Academy Trust

Signed off by: Trust Board

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1 Overview

The purpose of this policy is to ensure that St Francis of Assisi Catholic Academy Trust can clearly demonstrate that no undue influence has been applied or could be said to have been applied to 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.

2 Breaches

Any breach of this policy could lead to disciplinary action for the individual in question and may constitute gross misconduct. Employees shall not use their authority or office for personal gain in any circumstances and shall seek to uphold and enhance the standing of the Trust at all times.

3 Staff requirements and expectations

All staff in the Trust must:

1. Maintain an unimpeachable standard of honesty and integrity in all their business relationships.
2. Comply with the letter and spirit of the law, and contractual obligations, rejecting any business practice that might be deemed improper.
3. Any employee who becomes aware of a breach of policy must report this immediately to his or her line manager who will instigate investigations as necessary. Any breaches must be reported to the CEO as well.
4. Any personal interest that may impinge or might reasonably be deemed by others to impinge on an employee's impartiality or conflict with the duty owed to the Trust in any matter relevant to an employee's duties (such as conflicting business interests) should be declared in writing. Any member of staff who is aware of any business dealings conferring personal gain, or involving relatives or associates of members of staff must supply details of such transactions for entry into the Register of Business Interests.
5. At all times in their business relationships acting to maintain the interests and good reputation of the Trust.

4 Gifts and Hospitality rules

The following general rules apply and must guide decisions on receipt of gifts as an employee of the Trust.

4.1 Gifts:

Principles:

The Trust expects staff, directors and governors to exercise the utmost discretion in giving and accepting gifts and hospitality. Particular care should be taken about a gift from a person or organisation that has, or is hoping to have, a contract with the Trust or one of its academies.

Staff 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 might be placed under an obligation.

Register of Gifts

In the interests of transparency, a Register of Gifts and Hospitality is to be established and kept in the Academy Office. Any member of staff who accepts an offer of a gift or hospitality over the value of £100 must ensure this is recorded in this register using the form attached.

To accept gifts should be the exception and not the norm. You may accept small 'thank you' gifts of token value, such as a diary, chocolates, a mug or a bunch of flowers, not over £150 in value. You should notify the Head Teacher (or Chief Executive Officer if you are the Headteacher; Trust Board if you are the CEO) of any gift or hospitality over this value for entry in the Register of Gifts and Hospitality.

It is well-established practice within the education sector that employees of the Trust may be presented with small tokens of appreciation, for example at the end of a Academy trip or at the end of the Academic year and this is seen as acceptable. However, it is unacceptable to receive gifts on a regular basis from the same person or family, or to receive gifts that are of a significant value. There may be other occasions when it is appropriate to accept gifts (e.g. where refusal of the gift may offend the giver) or where it may be difficult to return (e.g. if it is from an anonymous source). Therefore, it can sometimes be difficult to decide which offers can be accepted and which cannot. In these circumstances, any employee or worker must only accept occasional, token gifts that are clearly a small gesture of appreciation. If gifts from the same source become frequent (monthly or more) and/or are significant in value (over £25) this must be reported to the Head Teacher/ Chief Executive Officer and recorded within the Register of Gifts and Hospitality. Failure to report such gifts could result in a disciplinary.

- Always decline if you think the giver of the gift has an ulterior motive. Be sensitive to the possibility that the giver may think that even small gifts or simple hospitality will result in a more prompt service or preferential treatment.
- Never accept a gift or hospitality from anyone who is, or may be in the foreseeable future, tendering for any contract with the Trust, seeking employment with the Trust or is in dispute with the Trust, even if you are not directly involved in that service area.
- Where items purchased for the Trust include a 'free gift', such a gift should either be used for Trust business or handed to the Head Teacher/ Chief Executive Officer to be used for charity raffles so the gift can be redistributed without obtaining any gain from it.
- If you are in doubt about the acceptability of any gift or offer of hospitality it is your responsibility on all occasions to consult the Head Teacher or the Chief Executive Offer.

4.2 Hospitality:

A good gauge of what is and what is not acceptable in terms of hospitality is whether this Trust would offer a similar level of hospitality in similar circumstances.

- Invitations to corporate hospitality events must each be judged on their merit. Provided the general rules have been taken into account, it may be acceptable to join other company/organisation guests at:
 - Sponsored sporting, religious or cultural events, or other public performances, as a representative of the Trust;
 - Special events or celebrations.
- Occasional working lunches with customers, providers or partners are generally acceptable as a way of doing business provided they are not to an unreasonable level or cost.

Consider the number of these events, and always take into consideration what public perception is likely to be if they knew you were attending.

- Acceptability depends on the appropriateness of the invitations, in terms of the level of hospitality, the frequency and the status of the invited employee. In all such cases the Head Teacher/ Chief Executive Officer must be consulted.
- Paid holidays nor the use of company villas/apartments are not acceptable.
- If you are visiting a supplier to view plant or equipment that the Trust is potentially considering buying, you should ensure that expenses for the trip are paid by the Trust. Acceptance of refreshments and/or a working lunch when on site may be acceptable, but care must be taken to ensure that the Trust's purchasing and/or tender procedures are not compromised.

Consider the number of these events that are occurring, and always take into consideration what public perception is likely to be if they knew you were attending. It is important to consider how an action would be perceived rather than the actual reasons for an action.

- Acceptance of sponsored hospitality that is built into the official programme of conferences and seminars related to your work are acceptable.
- Offers to speak at corporate dinners and social gatherings, or events organised by, for example, a professional body, where there is a genuine need to impart information or represent the Trust must be agreed in advance with the Chief Executive. Where your spouse or partner is included in the invitation, and approval has been given for you to attend, it will be acceptable for your spouse or partner to attend as well, but if expenses are incurred, these will be met personally.
- Any invitation you accept should be made to you in your professional/working capacity as a representative of the Trust.

5 Monitoring of Policy

This Policy is to be reviewed by the Trust Board on an annual basis and must be signed by the Chair of Trust Board.