

POLICY TYPE: PRESCRIBED
ACTION: FOR SCHOOL ADOPTION

Approval Body: SDBEMAT BOARD
Approval Date: SEPTEMBER 2021
Version: 2 (SEPTEMBER 2021)
Policy Ref: FPHG&H



**Southwark Diocesan
Board of Education
Multi-Academy Trust**
Developing Church of England Education

FINANCE POLICY HANDBOOK

GIFTS & HOSPITALITY POLICY

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1. PURPOSE OF THE POLICY

The Southwark Diocesan Board of Education Multi-Academy Trust (SDBE MAT) is committed to ensuring that the leadership and governance of the Trust, and the Academies within the Trust, is conducted in accordance with the highest standards of integrity, probity, and openness.

The policy applies to all employees, local governors, directors, contractors and consultants or other associated persons, agents or representatives acting in the name of, or on behalf of, or dealing with the Trust and its Academies.

The purpose of this policy is to ensure that the business conducted by employees, local governors and directors of, and those associated with, the SDBE MAT and its Academies is appropriate and avoids the risk of any perceived or real conflict of interest or allegation of bribery or corruption.

The policy outlines the approach of the Multi-Academy Trust on the receipt of gifts and hospitality by its employees, local governors, directors, and those associated with the Multi-Academy Trust and its Academies from any third parties arising from duties undertaken on behalf of the Trust.

2. PRINCIPLES OF THE POLICY

Practices, such as obtaining goods and services which may include an element of private use for employees, local governors and directors should be avoided.

Employees, local governors and directors should avoid accepting excessive hospitality, entertainment or other services from existing or prospective suppliers.

A Register of Gifts and Hospitality should be established at each Academy and at the central MAT office, which should be updated as soon as practicably possible where excessive hospitality, entertainment, gifts or other services are offered or received as a result of the position held within the Trust.

The Registers of Gifts and Hospitality are open documents and must be made available for inspection by the Chief Executive Officer, Chief Operating Officer, Chief Financial Officer of the Multi-Academy Trust, and the Auditors.

It is a mandatory requirement for the Academy to hold a Register of Gifts and Hospitality, even if there is a nil return. It is recommended that the Register of Gifts and Hospitality is held alongside the Register of Pecuniary and Business interests and is freely available in the Academy office.

3. DEFINITION

The expressions “gifts” and “hospitality” have wide meanings and no conclusive definition is possible. Gifts and hospitality can include:

- Free gift of any goods or services;
- The opportunity to acquire any goods or services at a discount or at terms not available to the general public;
- The opportunity to obtain goods or services not available to the general public;
- The offer of food, drink, accommodation or entertainment.

Common gifts include pens, diaries, calendars and other business stationery, articles of clothing, books, wine, and flowers. Common hospitality includes lunches provided by external bodies.

For the purpose of this policy a “gift” is defined as any item, cash or goods or any service, which is offered for personal benefit at no cost, or at a cost that is less than its commercial value.

“Hospitality” is defined in this policy as any generous or material welcome or reception that is more than an incidental beverage or light refreshment e.g. attendance as a non-paying guest at a cultural, sporting or other event.

The real test is whether the acceptance of any gift and/or hospitality could be regarded by a third party as compromising or likely to compromise the impartiality and objectivity of a member of the Trust.



4. GENERAL RULES

Employees, local governors and directors must not receive gifts, hospitality, or benefits of any kind from a third party which might be seen to compromise their personal judgement or integrity. Academy employees and local governors are asked to immediately report any offer or receipt of such gifts to the Academy Business Manager to be recorded in the Register of Gifts and Hospitality. Employees or directors of the Multi-Academy Trust are asked to immediately report any offer or receipt of such gifts to the Company Secretary to be recorded in the Register of Gifts and Hospitality.

Employees, local governors and directors shall not use their authority for personal gain and shall seek to uphold and enhance the standing and reputation of the Multi-Academy Trust at all times by:

- Maintaining an unimpeachable standard of honesty, integrity and selflessness in all their business relationships;
- Complying with the letter and the spirit of the law and their contractual obligations rejecting any business practice that is deemed improper;
- Acting to maintain the interests and good reputation of the Trust and/or the Academy at all times.

Employees, local governors, and directors are permitted to accept isolated gifts of a trivial nature or inexpensive seasonal gifts or corporate branded items (such as diaries, pens, calendars). Such gifts can be accepted without the need to seek approval or formally register receipt.

Promotional gifts or small items from a supplier, contractor, or parents as an expression of gratitude such as boxes of chocolates or a bottle of drink may be accepted. Occasional modest meals with people with whom the Academy or Multi-Academy Trust conducts business or occasional attendance at modest entertainment, theatre or sporting events is also acceptable provided that there is no expectation or belief that something will be forthcoming in return.

Acceptance of gifts or hospitality with a value exceeding £50 must always be subject to prior approval from the Academy Headteacher or the Chief Executive Officer Trust or Chairman of the Multi-Academy Trust Board and must be recorded and reported in the Gifts and Hospitality Register.

Employees, local governors and directors may accept the following gifts/ hospitality without the need to formally register receipt or seek approval of the Academy or the Multi-Academy Trust:

- 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 / hospitality are accepted no obligation to the person or organisation in question is accepted. If there is any doubt the advice of the Multi-Academy Trust must be sought.

The following are examples of gifts or hospitality requiring approval and formally recording by the Academy Business Manager or Company Secretary in the Register of Gifts and Hospitality:

- Attendance as a non-paying guest or a commercial organisation or individual at a non-work related cultural or sporting event;
- Promotional gifts exceeding the value of £50;
- Other offers of gifts or hospitality.

5. UNACCEPTABLE GIFTS OR HOSPITALITY

The following are examples of gifts or offers of hospitality which should be refused by employees, governors, and directors:

- Gifts of money;
- Free membership or subscriptions (e.g., Sports clubs);
- Foreign travel unless a specific element of a business, academic or research activity is approved by the MAT Board;
- Free goods, services or equipment which are normally provided by a supplier to the Academy or Trust at a charge

NB: Any offers falling into the above category should be reported immediately to the Academy Business Manager or the Company Secretary.



6. GIFTS AND HOSPITALITY GIVEN

Reasonable costs to entertain visitors on Academy or Multi-Academy Trust business are acceptable. The cost of a working lunch, sandwiches, finger buffet and non-alcoholic beverages would be considered reasonable.

It is acceptable to provide employees with refreshments at a reasonable cost to the Academy or Multi-Academy Trust as part of training or development events. For this purpose training and development is taken to cover not only training courses but also developmental meetings including for example departmental meetings, consultations meeting and general staff developmental activities.

In line with guidance from the ESFA that Academies should use their allocated GAG funding for the full benefit of their current pupils, the Academies and the central MAT should consider carefully the use of their funds to purchase gifts and items such as flowers for members of staff and people outside the Academy or Trust. Any such item should be a justifiable and reasonable cost.

7. ROLE OF ACADEMY BUSINESS MANAGER / COMPANY SECRETARY

Responsible for ensuring that any offer or receipt of gifts, hospitality or donations is recorded in the Register of Gifts and Hospitality.

Reporting any possible conflict of interest arising from the offer or receipt of gifts and or hospitality.

Responsible for ensuring that employees, local governors, contractors, consultants, and agents that work for the Academy or the Multi-Academy Trust are made aware of the policy.

8. EMPLOYEE, GOVERNOR AND DIRECTOR RESPONSIBILITIES

Employees, local governors and directors have a responsibility to:

- Comply with this policy;

- Report gifts or hospitality offered and whether they have been accepted or declined;
- Raise any concerns about the operation of the policy with their line manager in the first instance or the Academy Business Manager.

