



# **POLICY DOCUMENT**

For use by all staff

## **Gifts and Hospitality 2024 - 2027**

|                        | <b>Name</b>  | <b>Date</b> |
|------------------------|--|-------------|
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| Review v1.3            | John Cliff, Chair of FARCO                                 | Apr 2024    |

## Background

The Spring Partnership Trust is committed to the highest level of integrity, honesty and accountability in all its business dealings. All staff, Trustees and Local Advisory Council members are expected to maintain high standards of propriety and professionalism, ensuring they are free from any conflict of interest through their business in the name of the Trust.

The Trust and each school will hold a Gifts and Hospitality Register to be held by the school office or other relevant staff member. All gifts/hospitality received of or over the value of £50 must be recorded in the relevant Gifts and Hospitality Register. It is each individual's responsibility to inform the relevant staff member responsible for the register by e-mail of any gifts or hospitality offered or declined.

The following information will be recorded in the Gifts and Hospitality Register:

Date of gift, name of recipient, name of donor, nature of gift, value of gift, reason for gift or for declining gift.

## Definition

A gift is any item, cash, vouchers, goods or benefit in kind given or offered for which no payment or service was given or received in return.

Hospitality can be defined as any food, drink, accommodation or entertainment provided free of charge, heavily discounted or not available to the general public.

## Dealing with Gifts and Hospitality

The Trust expects staff, Trustees and Local Advisory Council members to exercise the utmost discretion in giving and accepting gifts and hospitality when on Trust or school business. Particular care should be taken with regard to gifts received from a person or organisation that has, or is hoping to have, a contract with our organisation.

Staff, Trustees or Local Advisory Council members must not accept gifts, hospitality or benefits in kind from a third party where it might be perceived that their personal integrity is being compromised or that the Trust or any of its academies might be placed under an obligation.

No favour or preference which is not generally available should be sought, accepted or given.

Staff, Trustees or Local Advisory Council members must not make use of their official position to further their private interests or those of others.

Gifts of low intrinsic value such as promotional calendars and diaries, or small tokens of gratitude can be accepted. If there is any doubt as to whether the acceptance of such an item is appropriate, individuals should decline the gift or refer the matter to their line manager.

It is common for appreciative parents and pupils to register their thanks for the work of staff in the form of a personal gift or class collection. Personal gifts valued at £50 or over received from one individual should be recorded in the register. Gifts presented from a class or group collection do not need to be recorded in the register unless the value of the goods received totals £150 or more.

Where a more valuable gift, benefit or service is offered which is to the good of the school or Trust, rather than an individual, it must be referred to a senior leader for approval within their discretion; if acceptable, then these terms must be recorded in the register.

Hospitality such as working lunches, coffees etc are acceptable where it is appropriate to offer or receive these in support of good relationships with visiting staff or business colleagues. Modest hospitality, provided it is reasonable in the circumstances, should be similar to the scale of

hospitality which the Trust as an employer would be likely to offer. These would not be added to the register. Hospitality received above this level should be recorded in the register.

If a member of staff, Trustee or Local Advisory Council member is offered a gift or hospitality whilst involved in the procurement of goods and services, tenders for work or when liaising with anyone conducting business with the school or Trust (other than light refreshments) it is their responsibility to discuss this with a senior leader immediately.

If not accepting a gift would be regarded as causing offence (such as a sudden and unexpected gift or one where refusal could cause cultural offence) the item should be accepted. The matter should then be brought to the attention of a senior leader as soon as possible, who may decide to return the gift, or may donate it to the school raffle/fair or a charitable cause. In certain circumstances gifts may be refused at the point of presentation.

Examples of gifts or hospitality that should not be accepted are cash; gifts or hospitality offers to a member of your family; gifts or hospitality from a potential supplier or tenderer in the immediate period before tenders are invited or during the tender process; staff, Trustees or Local Advisory Council member attendance at sporting and cultural events at the invitation of suppliers, potential suppliers or consultants. Where it is considered that there is a benefit to the Trust or one of its schools in a member of staff, Trustee or Local Advisory Council member attending a sponsored event, the attendance must be formally approved in advance and registered by a senior leader.

Where a gift is received on behalf of the school or Trust, the gift remains the property of the receiving establishment. The gift may be required for departmental display or it may, with senior leader approval, remain in the care of the recipient. Unless otherwise agreed, the gift should be returned to the department on or before the recipient's last working day.

Gifts are sometimes offered by suppliers with the purchase of items. All such special offer gifts are the property of the school or Trust and must be used accordingly.

#### Giving gifts and hospitality

The Trust and its schools 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 Gift 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 eg attainment or merit awards.

Where hospitality is provided by the Trust or its schools this should be approved in advance by a senior leader. In approving hospitality, it should be ensured that it is not in breach of the UK Bribery Act 2010 and also 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 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.

#### Non-Compliance

In the case where it is believed a member of staff, a Trustee or a Local Advisory Council member has not declared a gift or hospitality then a formal investigation may be instigated by a senior leader. If misconduct is indicated, this may take the form of disciplinary procedures in the case of employees.