



The Consortium Trust

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Gifts & Hospitality Policy

1. Introduction

1.1 The purpose of this document is to ensure that the Trust, Trust Schools and establishments operate with accountability, openness, honesty and integrity. The guidance provides direction for employees, governors and trustees in dealing with gifts and hospitality.

2. What is a gift?

2.1 A gift is any item or service that you receive free of charge. It also includes any goods or services which you personally are offered at a discounted rate or on terms not available to the general public.

3. What is hospitality?

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

4. Gifts

4.1 Staff and governors are permitted to accept gifts, rewards or benefits from pupils', pupils' families, members of the public, or organisations which the Trust and its schools has official contacts with, only where they are isolated gifts of a trivial character, or inexpensive seasonal gifts (such as chocolates, flowers, diaries or calendars).

4.2 For the purpose of clarity note that gifts extended by way of school community collections for special occasions or bereavement are not restricted. If there is any concern around the intentions of such a collection this should be referred to the Academy Head/Local Chair of Governors or line manager. Any such referrals should be declared to the CEO and where it relates to the CEO to the Trust Board Chair.

4.3 Gifts should not be accepted if they appear to be disproportionately generous, or could be construed as an inducement to effect a decision or action, whether business, educational, or other.

4.4 What gifts or hospitality should never be accepted? You must never accept:

- > Cash or monetary gifts of any value (except see 4.2 above);
- > Gifts or hospitality offered to your husband, wife, partner, family member or friend;
- > Gifts or hospitality from a potential supplier or tenderer in the immediate period before tenders are invited, or during the tender process;
- > Lavish or extravagant gifts or hospitality, even if they relate to activities in your own time;

4.5 You should treat with caution any offer of gift or hospitality made to you personally. In particular, think about whether there is a benefit to the Trust or School in you accepting, the scale, amount, frequency and source of the offer, the timing of the offer in relation to forthcoming decisions and whether accepting could be misinterpreted as a sign of your, or the school's, support or favour.



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4.6 Personal gifts may not be solicited under any circumstances. To do so would be in contravention of the Bribery Act 2010, and would be a disciplinary offence which could lead, depending in the circumstances, to summary dismissal.

5. Gifts of below £25.00

5.1 Low-value gifts of items (up to about £25) need not be declared, nor items such as free promotional pens, calendars, diaries or similar items.

5.2 Gifts which are intended for the Trust or School as an institution can be accepted, but must not be retained by the individual who receives them. Such gifts should be deposited with the School Office for use by the School.

6. Gifts above £25.00

6.1 All gifts of items worth more than £25 must be recorded in the School's/Trusts gifts and hospitality register, which is maintained in the School/Trust Office, within five working days. If the gift is not registered within this time and it comes to light later, it may be assumed by the Trust/School that the failure to register was deliberate, if there is any cause to question how the gift was dealt with.

6.2 Retention by an individual of gifts intended for the School's use will be treated as a disciplinary offence which could lead, depending in the circumstances, to disciplinary action.

7. Declining a Gift

7.1 If you estimate that the gift is more than just a token (above the value of £25.00), you should politely and courteously decline the gift. If you feel that it would not be appropriate to do this, you should refer the matter to your Academy Head or Line Manager as soon as possible and let the Academy Head or Line Manager decide what you should do with the gift. Academy Head or Line Manager may decide to return the gift, may ask the Chair of Trustees/Governors for a view, or may donate the gift to a worthy local cause.

7.2 Gifts are sometimes offered by suppliers with the purchase of items. All special offer gifts are the property of the School and must be given to the Office Manager for use by the School. Such gifts should never sway the decision as to which supplier to use.

8. Hospitality

8.1 Staff should never accept lavish hospitality that could be interpreted as a way of exerting an improper influence over the way you carry out your duties. Nor should you offer such hospitality to others on behalf of the School. You should never solicit hospitality.

8.2 As a general rule, Staff should think carefully before accepting hospitality that the School/Trust would not reciprocate in similar circumstances. If you wish to accept hospitality which exceeds this level of expense, but which does not appear to be lavish in the context of the offerer's situation or business, you should seek advice from the Chair of the Finance & Resources committee (or similar) of the Board of Trustees or Chair of the Locality Committee.

8.3 Staff may accept modest working meals and light refreshments without making any declaration. All other hospitality must be recorded in the School's gifts and hospitality register which is maintained in the School Office.



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8.4 Other hospitality may be accepted where:

- > You are representing the School/Trust in the community or are imparting information about the School/Trust to the public.
- > An event is clearly part of the life of the community or where the School/Trust should be seen to be represented.
- > The hospitality concerns attendance at a relevant conference or course where it is clear the hospitality is corporate rather than personal.
- > Attending training courses and network meeting as directed by the School/Trust.

8.5 The timing of hospitality in relation to procurement or purchasing decisions that the School/Trust may be taking is especially sensitive. You should never accept a gift or hospitality from any organisation where you can reasonably foresee that you will be involved in deciding whether or not they should be awarded a contract or order.

8.6 When you have to decline hospitality, you should be courteous but firm, and draw the attention of the person making the offer to the existence of this policy and the UK Bribery Act 2010.

8.7 What should I do if I get offered a gift or hospitality?

You must make sure that all offers you receive which have a value of more than £25.00 are recorded in the school's Gifts and Hospitality Register, which is kept in the school office.

8.8 Do I need to record offers that I decline?

Yes – all offers of gifts or hospitality, which have a value of more than £25, must be recorded in the school's register, even if you don't accept.

9.0 Offering Gifts and Hospitality

9.1 The Trust encourages and seeks cooperative relationships between staff, governors, stakeholders and external organisations. Accordingly, there can be occasions where it is appropriate for the School/Trust to provide and fund limited gifts, in particular hospitality, which will principally be dealt with in-house.

9.2 The Trust operates a Long Service Retirement scheme.

9.3 Where it is desired that the Trust/School pays for external hospitality, this should be approved in advance by the Academy Head or Line Manager or Chair of the Finance & Resources committee (or similar) of the Board of Trustees or Chair of the Local Governing Body, who should review the request in light of the UK Bribery Act 2010. Any hospitality provided, whether internal or external, should not be extravagant.

10.0 Breach of Policy

10.1 The Trust wishes to encourage anyone having reasonable suspicions of breach of this policy to report them as per the Whistleblowing Policy.



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Document Control

Changes History

Version	Date	Amended By	Details of Change

Approval

Name	Job Title	Signed	Date
Andrew Aalders-Dunthorne	Principal/CEO	Electronic signature	25/01/18
Dawn Carman-Jones	On behalf of the Trust Board	Electronic signature	25/01/18

Equality Impact Assessment

Date	Name	Details

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