



Learn-AT
Learning ~ Fellowship

Gifts and Hospitality Policy

LAT003 Version 2 Updated October 2020

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Approved by: Trustees (29th October 2020)
Next Review: October 2023

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Please note that this policy supersedes and replaces any equivalent policies or sections of policies. This policy is non contractual and can therefore be amended without consultation. Before you use this policy, please check you have the latest version using the footer reference and Learn-AT Policy Index.

This policy applies to all Learn Academies Trust schools and should be read in conjunction with the latest associated guidance issued by Learn-AT.

The policy does not apply to agency workers, consultants or self-employed contractors.

1. Objectives Of The Policy

- 1.1. The intention of this policy is to ensure that the Trust can demonstrate that no undue influence has been applied or could be said to have been applied by 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.
- 1.2. As a general guideline, business gifts and hospitality should not be accepted by any employee, Trustee or Local Governor except as provided for below. Any breach of this Policy could lead to disciplinary action and may constitute gross misconduct. Employees, Trustees or Governors shall not use their authority or office for personal gain and shall seek to uphold and enhance the standing of the Trust.

2. Definitions

- 2.1. A Gift is any item or service, award, prize or any other benefit which is received free of charge; or personally offered at a discounted rate or on terms not available to the general public or which might be seen to compromise the personal judgment or integrity of the recipient.
- 2.2. Hospitality is the offer of food, drink, accommodation or entertainment or the opportunity to attend any cultural or sporting event not available to the general public.

3. Policy For Receiving Gifts And Hospitality

- 3.1. Employees, Trustees and Governors shall not use their authority or office for personal gain and shall seek to uphold and enhance the standing of the Trust by;
 - 3.1.1. maintaining an unimpeachable standard of honesty and integrity in all their business and pupil relationships.
 - 3.1.2. complying with the letter and spirit of the law, and contractual obligations, rejecting any business practice that might be deemed improper.
 - 3.1.3. At all times in their business relationships acting to maintain the interests and good reputation of the Trust.

- 3.2. Whilst the principles outlined above apply to all activities connected with Trust and the Academies, it is clearly acknowledged in this policy that gifts are often offered to teachers as a thank-you with no thought or possibility of personal gain.
- 3.3. Any employee who becomes aware of a breach of policy must report this immediately to the Head Teacher or the Director of Finance and Operations who will instigate investigations as necessary.
- 3.4. In the case where it is believed an employee, trustee, or governor has not declared a gift or hospitality then a formal investigation will be instigated by the Trustees. If it is concluded there is possible misconduct the Trust may initiate disciplinary procedures in the case of employees or any other appropriate procedures.
- 3.5. 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 to the Director of Finance and Operations.
- 3.6. Any employee who is aware of any business dealings conferring personal gain, or involving relatives or associates of employees must supply details of such transactions for entry into the Register of Business Interests.
- 3.7. Where a personal interest exists, the relevant person (Employee, Trustee and Governor) should be excluded from any decision relevant to that interest.
- 3.8. An employee is not permitted to accept gifts, hospitality, rewards or benefits from members of the public (including parents) or organisations the Trust has contacts with unless;
 - 3.8.1. They are isolated gifts of a trivial character (such as flowers, diaries or calendars, or small personal gifts from parents) and;
 - 3.8.2. They have a total market value of less than £30.
- 3.9. Some examples of gifts or hospitality that should not be accepted are;
 - a. cash or monetary gifts;
 - b. gifts or hospitality offers to a member of the employee's family;
 - c. gifts or hospitality from a potential supplier or tenderer in the immediate period before tenders are invited or during the tender process;
 - d. staff, trustee or Governor 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 academies in an employee, trustee or Governor attending a sponsored event, the attendance must be formally approved and registered by the Director of Finance and Operations).
- 3.10. Where purchased items include a "free gift", such gifts should be either used for Trust business or handed to the Trust to be used at charity raffles etc.
- 3.11. Any hospitality or facilities other than of a nominal value (up to £30 per employee) received during the normal course of business should be should be approved in advance by the Director of Finance and Operations. The approval should be recorded in the Register of Business Interests.

- 3.12. Subject to the approval required in 3.8 above, in relation to conventional hospitality (lunches, outings, tickets for events etc.) provided that it is normal and reasonable in the circumstances they may be accepted by an employee. Such invitations should not be accepted where there is no reasonable business justification for doing so, where an invitation is disproportionately generous, or where the invitation could be seen as an inducement to affect a business decision. An employee should always either decline the hospitality or seek guidance from the Director of Finance and Operations if they are unsure whether or not to accept such hospitality.

4. Policy For Giving Gifts And Hospitality

- 4.1. The Trust and its academies will not normally give gifts to other individuals or organisations. If gifts are given, employees must ensure that the decision is fully documented in the Register of Business Interests. 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 e.g. attainment or merit awards.
- 4.2. Hospitality of a trivial nature such as working lunches, coffees, modest hospitality in the form of inexpensive meals are acceptable where it is appropriate to offer or receive these in support of good relationships with visiting staff, parents or business colleagues (but not for family or friends). These do not need to be recorded in the Register of Business Interests. Any other hospitality provided should be recorded in the Register of Business Interests.
- 4.3. Where hospitality costing in excess of £100 in total per event will be provided by the Trust or its academies this should be approved in advance by the Director of Finance and Operations and the approval should be recorded in the Register of Business Interests.
- 4.4. Any employee who becomes aware of a breach of policy must report this immediately to the Head Teacher or the Director of Finance and Operations who will instigate investigations as necessary.

5. Review And Approval

- 5.1. This Policy will be reviewed by the Finance Committee on a 3 yearly cycle and approved by Trustees.