



Bridgnorth Area Schools' Trust  
**Gifts and Hospitality Policy**

<b>FREQUENCY OF REVIEW:</b>	<b>Every two years</b>
<b>COMMITTEE:</b>	<b>Audit</b>
<b>APPROVED:</b>	<b>Summer 2018</b>
<b>AUTHOR:</b>	<b>Director of Finance and Business</b>
<b>DATE OF NEXT REVIEW:</b>	<b>Summer 2020 unless there is a material change</b>

## **Contents**

This document consists of:

- Trust Policy on gifts and hospitality
- Template for Declaration of a Gift or Hospitality (Appendix A)
- Template for Gifts and Hospitality Register for completion by each School within the Trust (Business Manager or Office Manager/Administrator (Appendix B)
- '7 Principles of Public Life' – Appendix C

## **Introduction**

As a rule, gifts and hospitality should not be accepted by staff, trustees or governors, except in the circumstances set out below. If there is any doubt as to whether a gift or offer of hospitality can be accepted, advice should be sought from the Director of Finance and Business.

The purpose of this policy is to ensure that neither the Bridgnorth Area Schools' Trust (BAST), nor any of its schools, is the subject of undue influence by any supplier or any other party. BAST and its schools should be able to show that all spending decisions are reached on the basis of value for money and for no other reason.

## **Background**

The Bridgnorth Area Schools' Trust is committed to the highest level of integrity, honesty and accountability in all its business dealings. All staff, trustees and governors are expected to maintain high standards of propriety and professionalism in all their dealings, ensuring they are free from any conflict of interest through their business in the name of the Trust.

In order to protect all individuals associated with the Trust, and the reputation of the Trust from accusations of bribery or corruption staff, trustees and governors must take extreme care that none of their dealings, directly or indirectly, could be deemed as a reward or benefit, in line with the Prevention of Fraud and Bribery Act 2010. This Act makes it a criminal offence to:

- offer, promise or give a bribe,
- request, agree to or accept a bribe,
- (by an organisation) fail to prevent bribery by those acting on its behalf ('associated persons') to obtain or retain business or a business advantage for the organisation.

Under this Act, a bribe is 'a financial or other advantage' offered, promised or given to induce a person to perform a relevant function or activity improperly, or reward them for doing so.

The Trust will hold a Gifts and Hospitality Register. All gifts/hospitality over the value of £30 must be recorded in the Gifts and Hospitality Register.

## **Definitions**

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.

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.

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 Headteacher or Trust Director of Finance and Business, Local Chair of Governors or line manager. Any such referrals should be declared to the Executive Headteacher and, where it relates to the Executive Headteacher, to the Chair of the Trust Board.

## **Dealing with Gifts and Hospitality**

3.1. The Trust expects staff, trustees and governors to exercise the utmost discretion in giving and accepting gifts and hospitality when on Trust business. Particular care should be taken about a gift from a person or organisation that has, or is hoping to have, a contract with our organisation. In any case of doubt, advice should be sought from the Trust Director of Finance and Business.

3.2. Staff, trustees and governors must not make use of their official position to further their private interests or those of others.

3.3. Staff, trustees and governors 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.

3.4. Gifts of low intrinsic value such as promotional calendars or diaries, 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 the Trust Director of Finance and Business.

3.5. It is common for appreciative parents and pupils to register their thanks for the work of staff in the form of a small personal gift. If these are valued at less than £30 these are perfectly acceptable without reference to senior members of staff. These will not need to be recorded in the register. Where gifts valued over £30 are accepted, these should be recorded in the register.

3.6. Where a more valuable gift, benefit or service is offered which is to the good of the Trust, rather than an individual, it must be referred to the Director of Finance and Business or, if in the case of the Director of Finance and Business, to the Executive Headteacher for approval within their discretion; if acceptable, these items must be recorded in the register.

3.7. Hospitality such as working lunches, coffees etc. are perfectly 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

3.8. If a member of staff, trustee or governor 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 Trust (other than light refreshments) it is their responsibility to discuss this with the Trust Director of Finance and Business or, if in the case of the Trust Director of Finance and Business, the Executive Headteacher, or in the case of the Executive Headteacher, the Chair of the Trust Board immediately.

3.9. 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 the Trust Director of Finance and Business as soon as possible who may decide to return the gift, or may donate it to a school raffle/ fair or a charitable cause.

3.10. Examples of gifts or hospitality that should not be accepted are cash or monetary gifts; gifts or hospitality offers to a member of your family; gifts or hospitality from a potential supplier or tenderer in the immediate period projects/works are being considered i.e. business case stage or during the tender process; gifts or hospitality from a supplier prior to the renewal of a contract (6 months prior to a 3-5 year contract being renewed, 3 months prior to a 1-3 year contract being renewed) such as 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 in a member of staff, trustee or governor attending a sponsored event, the attendance must be formally discussed and approved by the Executive Headteacher and registered by the Trust Director of Finance and Business).

3.11. Where a gift is received on behalf of the school, the gift remains the property of the school. The gift may be required for departmental displays or it may, with the Headteacher's 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.

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

3.13. Gifts that are offered over the value of £30, and acceptance refused, should also be recorded in the register.

3.14. Other hospitality may be accepted where:

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

#### **4. Giving Gifts and Hospitality**

4.1. The Trust 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 Gifts and Hospitality Register and has regard to the propriety and regularity of the use of public funds. This does not apply to awards of gifts, prizes etc. related to the achievement of pupils e.g. attainment or merit awards.

4.2. Where hospitality is provided by the Trust this should be approved in advance by the Trust Director of Finance and Business. In approving hospitality, the Trust Director of Finance and Business should ensure it is not in breach of the UK Bribery Act 2010 and also that the costs are appropriate for a publically funded organisation.

Hospitality such as working lunches, coffees etc. and modest hospitality in the form of meals etc. are perfectly 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.

4.3. The purchase of alcohol using school funds (and therefore public monies) goes against the primary purpose of the Trust. Therefore any such expenditure should be limited to appropriate occasions and fall within the overall 'value for money' framework and conform to the '7 principles of public life' – see Appendix C for more detail. This applies to purchases such as a gift (wine on retirement for example).

#### **5. Compliance**

In the case where it is believed a member of staff, trustee or governor has not declared a gift or hospitality then a formal investigation will be instigated by the Headteacher/Executive Headteacher. If misconduct is indicated, this may take the form of disciplinary procedures in the case of employees.

The Gifts and Hospitality Policy has been adopted by the Trustees of Bridgnorth Area Schools' Trust

Signed \_\_\_\_\_

Chair of Audit Committee

Dated \_\_\_\_\_

Signed \_\_\_\_\_

Headteacher

Dated \_\_\_\_\_

**Appendix A**

**DECLARATION OF A GIFT OR HOSPITALITY**

<b>Name:</b>	<b>Position:</b>
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**Please insert a ✓ in the relevant box below:**

**I have been offered a gift / hospitality which I have declined.**

**I have been offered a gift / hospitality which I have accepted.**

**Date and time of offer:**

**Place where offered:**

<b>Name of organisation / person making the offer and their relationship with the school</b>	<b>Nature of interest / gift / hospitality</b>	<b>Estimated value if applicable</b>

**Reason for accepting / declining gift / hospitality:**

**Signed:** \_\_\_\_\_ **Date:** \_\_\_\_\_

**Approved:** \_\_\_\_\_ **Date:** \_\_\_\_\_

**(Executive Headteacher/ Headteacher / Trust Director of Finance and Business)**

On completion, please return this form to the Headteacher/Trust Director of Finance and Business who will keep this and record in the Register in date order.

Entered in Register

<b>Entered in Register:</b>	<b>Date:</b>	<b>Reference:</b>
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## Appendix C

### 7 Principles of Public Life

#### 1. Selflessness

Holders of public office should act solely in terms of the public interest.

#### 2. Integrity

Holders of public office must avoid placing themselves under any obligation to people or organisations that might try inappropriately to influence them in their work. They should not act or take decisions in order to gain financial or other material benefits for themselves, their family, or their friends. They must declare and resolve any interests and relationships.

#### 3. Objectivity

Holders of public office must act and take decisions impartially, fairly and on merit, using the best evidence and without discrimination or bias.

#### 4. Accountability

Holders of public office are accountable to the public for their decisions and actions and must submit themselves to the scrutiny necessary to ensure this.

#### 5. Openness

Holders of public office should act and take decisions in an open and transparent manner. Information should not be withheld from the public unless there are clear and lawful reasons for so doing.

#### 6. Honesty

Holders of public office should be truthful.

#### 7. Leadership

Holders of public office should exhibit these principles in their own behaviour. They should actively promote and robustly support the principles and be willing to challenge poor behaviour wherever it occurs.

**Source: More information can be found by visiting:**

**<https://www.gov.uk/government/publications/the-7-principles-of-public-life/the-7-principles-of-public-life--2>**