



# Gifts & Hospitality

**Approved by: Trust Board**

**Last reviewed: July 2024**

**Next review due: July 2025**

## GIFTS & HOSPITALITY

### 1. Scope

This policy is written and approved at board level, but applies to all members, trustees, governors and employees of schools, settings, and services, hereafter the 'organisations,' within The Claxton Trust.

This policy should be read in conjunction with the Anti-Fraud, Anti-Bribery & Anti-Corruption Policy.

### 2. Background

The Claxton Trust is committed to the highest level of integrity, honesty, and accountability in all its business dealings. All members, trustees, governors, and employees 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.

To prevent accusations of bribery or corruption, all members, trustees, governors, and employees 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.

### 3. 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 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 public.

### 4. Receiving Gifts and Hospitality

The trust expects members, trustees, governors, and employees to exercise the utmost discretion in receiving gifts and hospitality when on trust or academy business. 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 accounting officer.

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

Members, trustees, governors, and employees 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 / organisation might be placed under an obligation.

Gifts of low value (under £30) such as promotional calendars or diaries, or small tokens of gratitude from parents & carers, 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 accounting officer.

It is common for appreciative parents, carers, and pupils to register their thanks for the work of employees 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.

Where a more valuable gift, benefit or service is offered which is to the good of the academy, rather than an individual, it must be referred to the accounting officer for approval within their discretion; if acceptable, these items must be recorded in the register.

Hospitality such as working lunches, coffees etc are perfectly acceptable where it is appropriate to receive these in support of good relationships with visitors. Modest hospitality, provided it is reasonable in the circumstances, should be like 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, trustee, governor, or employee 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 (other than light refreshments) it is their responsibility to discuss this with the accounting officer immediately.

Examples of gifts or hospitality that must be referred to the accounting officer 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 before tenders are invited or during the tender process; member/trustee/governor/employee 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 a member/ trustee/ governor/employee attending a sponsored event, the attendance must be formally approved and registered by the accounting officer.

Where a gift is received on behalf of the school, as opposed to gifted to an individual, the gift remains the property of the school. The gift may be required for departmental display, 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 organisation on or before the recipient's last working day.

Gifts are sometimes offered by suppliers with the purchase of items, for example a credit note to be used against future purchases. All such gifts are the property of the trust and must be used accordingly.

## **5. Giving Gifts**

The trust and its organisations will not use public money to give gifts to individuals or organisations.

The only exception is where a school may give low value awards or prizes to individual pupils on roll related to the achievement of pupils: e.g., attainment or merit awards, trophies.

Resources purchased for individual children for their exclusive use should not be gifted to the child and such resources should be returned to the school once they are finished with. e.g., IT hardware; books; learning resources

The trust and its organisations never make contributions to politicians, political parties, or election campaigns.

## **6. Providing hospitality**

From time to time, the trust and its organisations may provide the following basic hospitality:

- tea and coffee for staff & visitors
- refreshments for events

- working lunches

The costs for hospitality and entertaining should be, and be seen to be, reasonable, in line with the value for money principle, and should not create a personal benefit or risk bringing the trust into disrepute.

Hospitality will never include the purchase or provision of alcohol.

The annual budget for hospitality costs for each school/organisation in the trust will be set in advance by the local governing body and approved by the board as part of the annual budget setting process. Cost will be monitored against a dedicated nominal code throughout the year.

Where hospitality costs exceed the annual budget for an individual school/organisation, this must be approved in advance by the accounting officer. In approving hospitality, the accounting officer will ensure it is not in breach of the UK Bribery Act 2010 and that the costs are appropriate for a publicly funded organisation.

### **Non-compliance**

In the case where it is believed a member, trustees, governor, or employee has not implemented the gifts and hospitality policy intentionally then the chief executive officer will instigate a formal investigation. If misconduct is indicated in the case of employees, this may take the form of disciplinary procedures.