



The Rosary Trust

A Catholic Education Trust

Gifts & Hospitality Policy

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1. Introduction

This is the Academy's approved Code of Conduct relating to the offer and/or acceptance by staff of gifts and hospitality of whatever nature from outside individuals or organisations.

Within the terms of the Code, staff, and trustees and governors are expected to exercise common sense. If they are in any doubt, they must consult the Head Teacher and Chair of Trustees/Governors and in every case declare the acceptance of a gift or hospitality in the register kept by the Academy, using the Academy's 'Declaration of Gifts and Hospitality' form. See Appendix B.

The process set out is designed to safeguard trustees, Governors and staff from any misunderstanding or criticism.

The general principles which govern gifts and hospitality are: -

- Offers of hospitality should only be accepted if there is a genuine need to represent the Academy.
- Gifts should only be accepted in exceptional circumstances.
- The Code of Conduct applies to all Trustees and staff of the Academy.
- To determine whether a gift or hospitality is acceptable, the 'PROVEIT' test should be applied by staff and referred to the Head Teacher /Chair of Governors/ Chair of Trustees if in doubt. See Appendix A.
- Registers are accessible for viewing by the following appropriate officers: Head Teacher, Trustees, Governors, External Auditors and Internal Auditors.
- Any request by a member of the public to view the Register of Declarations of Gifts and Hospitality will be referred to the Head Teacher/CAO. In considering any request, they will balance the requirement for the Academy to be open and transparent against the requirements of the Data Protection Act 2018.

2. Hospitality

The following principles should be followed in deciding whether or not to accept hospitality: -

a) Staff, Governors and Trustees should ask themselves whether members of the public, knowing the facts of the situation, could reasonably think that they might be influenced by the hospitality offered. If the answer is yes, the hospitality should be declined. In making judgements, relevant facts to take into account

include the person or organisation offering the hospitality, its scale and nature, and its timing in relation to decisions to be made by the Academy.

b) Care should be taken to avoid situations in which an individual Trustee, Governor or member of staff is the sole person invited to partake of hospitality or where it creates a pattern of receiving hospitality from that organisation.

Examples of when it may be proper to accept hospitality (always depending upon the particular circumstances) are as follows: -

- a) Attendance at conferences, events and demonstrations of equipment organised by outside bodies where there is a service interest.
- b) Attendance at events or functions where there is a demonstrable need for the Academy to be represented to either give or to receive information or to participate as part of the Academy's corporate image.
- c) Attendance at events or functions which are part of the civic, cultural or sporting life of the Academy.
- d) Working lunches where this is an appropriate and effective way of conducting business and the refreshments provided are on a reasonable level.

Overnight hospitality linked to any of the above should be declared to either the Head Teacher, Chair of Governors or Chair of Trustees before being accepted.

3. Gifts

All personal gifts should be refused or donated to charity unless they come within the categories set out in 3(1) or 3(2) below.

(1) Gifts of the following type may be accepted: -

- (a) modest gifts of a promotional character, e.g. calendars, diaries and other similar articles. See also point 4; and
- (b) gifts on the conclusion of any courtesy visit to an outside organisation of a sort normally given by that organisation.
- (c) Gifts up to £20.00 in value

(2) Gifts which are intended for the Academy as a corporate body or intended for an Academy can be accepted but must not be retained by the individual who receives them. Such gifts should be passed to the Academy as appropriate.

4. Registration of Gifts and Hospitality

Staff must provide written notification to the Executive Head/Head Teacher using the 'Declaration of Gifts and Hospitality' form before accepting any gift or hospitality. This applies to any single gift exceeding the value of £20. Gifts below this value do not need to be declared.

The Declaration of Gifts and Hospitality forms must be completed in full, setting out full details of the offer or the gift and or hospitality received as well as:

- ❖ estimated or actual value;
- ❖ an indication from the Head Teacher, Chair of Governors or Chair of Trustees as to why acceptance of the offer is authorised;
- ❖ the employee's/Trustee's printed full name and signature; and
- ❖ the Head Teacher's, Chair of Governors or Chair of Trustees printed full name and signature.

5. Monitoring

The School Business Manager maintains a register of gifts and hospitality accepted. The School Business Manager will report annually the content of the register to the Finance Committee. Any concerns/issues identified should be noted and an action plan put in place by the Governors / Trustees.

6. Penalties for breaching the Code

The Academy's disciplinary procedures may be applied where it is found that breaches of the Code have occurred.

7. Retention of Documentation

Documentation in the Register will be kept for seven years.

APPENDIX A: Managing the Receipt of Gifts and Hospitality

The **PROVEIT** test:

Whether or not the offer is acceptable:

Purpose	Token, thanks or seeking a favour? (token or thanks: yes; favour: no)
Rules	What are they? Does this situation conform?
Openness	Is the offer transparent?
Value	Expensive or inexpensive?
Ethics	Does the offer fit with academy ethics? Is this an exceptional circumstance?
Identity	Who has made the offer?
Timing	Are you about to make a decision affecting the giver?

APPENDIX B: Declaration of Gifts and Hospitality Form

Receiving benefits, gifts, rewards or hospitality in return for providing services (even if these services are part of a usual role) can be perceived as an inducement to show favour to a person or organisation in his or her official capacity. Staff are advised to decline such offers, but it is acknowledged that there may be occasions when this is not feasible. If you have received the offer of, or wish to declare a gift or hospitality, please complete the form and return to the School Business Manager or CFO.

Details of employee receiving gift or hospitality

Full Name	
Job Title	
Department	
Date of Declaration	

Description of gift or hospitality

Description of gift / hospitality	
Value/estimated value of gift / hospitality	
Purpose of the offer	
Person/organisation providing the gift or hospitality	
Relationship to the person/organisation offering the gift or hospitality	
Acceptance of gift / hospitality	Yes / No

Approved by

Signature	
Date	
Name	
Job Title	