



Hospitality and Gifts Policy

To ensure all staff, Directors and Academy Council Governors are aware of the Trust's position on the acceptance of gifts and hospitality for business ventures.

Acorn Education Trust is committed to the highest ethical standards and acting with integrity in all business activities.

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1. Purpose

The purpose of this policy is to provide guidance to staff about the acceptance and giving of gifts and hospitality. Staff will need to use their judgement to decide how the Trust's interests and good name may best be served. A reasonable amount of entertainment is a normal part of the courtesies of public life, and extreme strictness can give unnecessary offence to people and organisations with whom the Trust's relationships should be cordial. But an appearance of improper influence is easily created and with it cynicism about the motives of those who work in the Trust.

The best general advice which can be given about offers of gifts or hospitality is to seek the advice of your line manager or, if in doubt, decline the offer. This is a good principle to follow since in law, the receipt of a gift in certain circumstances can impose a presumption of guilt which the 'accused' has to rebut.

2. Definitions

A gift is something that is given to an individual. Staff should be aware that all gifts and hospitality received (other than those of a minor nature) are not considered to be the property of the individual, but the property of the Trust, and should be recorded in accordance with this policy.

2.1. Gifts

The general convention should be that gifts offered by persons who are providing or seek to provide goods or services to Acorn Education Trust or who are seeking decisions from the Trust should be politely refused and returned. This applies particularly to personal gifts offered to employees or members of their families. However, there is a need to recognise and provide for items of a very minor nature which come into the work-place as a consequence of normal commercial practice or as a token of appreciation. These are the items of a promotional character including calendars, diaries and other minor articles for use in the workplace.

Gifts may also be offered, for example, at the conclusion of a courtesy visit to another organisation. If these are of the type normally given by that organisation to visitors and of a minor nature (see section 3) they can be accepted. Similar arrangements apply where the refusal of a small gift would give needless offence.

Gifts should not be accepted if the giver is currently seeking a decision of the Trust. The small gift should only be accepted if the giver merely wishes to express thanks for advice, help or co-operation received. In all instances of this nature it is wise to err on the side of caution; expensive gifts should be tactfully declined. If a gift is simply delivered it should be returned to the donor and the Business and Finance Director advised of the action taken. A note of the action taken should be placed on file by the Business and Finance Director. If there is a problem in returning it, the Business and Finance Director's advice should be sought.

2.2. Hospitality

Hospitality of differing levels might be offered to the Trust and accepted at official level because that course of action is reasonable in all the circumstances. However, an offer of hospitality to individual employees calls for special caution particularly if the “host” is doing or trying to do business with the Trust or hoping to obtain a decision from it; any suggestion of improper influence must be avoided. It is difficult to give fixed guidelines and it is a matter of individual judgement but the following paragraphs provide guidance about what is acceptable and what is not. It is however the individual’s responsibility to decide what is acceptable and what is not and, when in doubt, they must obtain advice from the Business and Finance Director.

A working lunch to allow parties to continue to discuss business already started would normally be acceptable: where the hospitality is secondary to a specific working arrangement. The employee should be careful not to claim subsistence allowance unless the money claimed has actually been spent. It would not be acceptable for an employee to accept a holiday, tickets for concerts, theatre or sporting events, the use of corporate facilities, or expensive meals not connected with official business.

2.3. Promotional Offers

Purchasing inducements are offered in various forms: gifts, vouchers to be used against future orders, the ‘buy one get one free’ type of offer and the misleading offers which results in more goods being ordered than are required. It is important to remember that when purchasing for the Trust, value for money must be the overriding principle. Any commission vouchers, cash discounts etc. offered by a contractor in connection with the order belong to the Trust; individuals must not derive any personal benefit in the conduct of Trust business.

If employees receive an approach from a supplier (or prospective supplier) which seems to be unauthorised in any way, or if they receive a gift or voucher from such a supplier, they should immediately inform the Business and Finance Director.

Charitable donations to the Trust are a separate issue, and are not covered by the scope of this policy.

3. Gifts and Hospitality of a minor nature

For the purpose of this policy, gifts of a minor nature are considered to be:

- Gifts from suppliers with an estimated value up to a maximum value of £20
- Small gifts from those receiving a service from the Trust as a token of appreciation (e.g. from parents or pupils to teachers)
- Small promotional items from suppliers that are routinely given to a wide range of people (e.g. calendars, notepads, pens, etc)

- A working lunch of modest standards to allow the parties to continue to discuss business already started (unless a tender or contract is currently under dispute or being negotiated)

Gifts and hospitality of a minor nature do not need to be recorded in the 'Register of Gifts and Hospitality'.

Under no circumstances should a member of staff give a gift to a student in school, unless it is part of a school initiative agreed by the Senior Leadership Team.

4. Other gifts not covered by section 3

Gifts exceeding an estimated value of £20.00 from a supplier should be reported to the Business and Finance Director and recorded in the Register of Gifts and Hospitality. Such gifts will not be kept by the individual, but will be placed in secure storage by the Business and Finance Director and used for the benefit of the Trust or local charities (e.g. in fundraising events, for raffle prizes, etc). Gift vouchers and cash will be kept in the safe.

Gifts with an estimated value exceeding £50 will be referred to the Finance Committee for consideration. The decision will be recorded in the Register of Gifts and Hospitality by the Business and Finance Director.

5. Other hospitality not covered by section 3

All offers must be recorded in the Register of Gifts and Hospitality, noting if the offer was accepted or declined. Individuals must not accept offers, other than those of a minor nature, without the written approval of the Finance Committee.

6. Responsibilities

All staff will record gifts or hospitality in accordance with the procedure above.

The Business and Finance Director will hold the Register of Gifts and Hospitality, and carry out annual checks to ensure that items recorded in the Register are properly accounted for. The register will be reported to the Finance Committee on a monthly basis.

The Business and Finance Director will hold items in secure storage, and arrange for the destination section of the Register to be completed when the items are allocated.

The Finance Committee will review this policy on an annual basis, which shall be authorised by the Board of Directors.

The Chair of Finance Committee will, where procedures for accepting or declining the gift or hospitality are unclear, make the final decision, and inform the Business and Finance Director who will record that decision in the Register.