



Gifts and Hospitality

Engage MAT

Date of ratification: November 2017.....

Date of review: November 2020.....



Gifts and Hospitality Policy

1. Introduction

This is the Engage Trust'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, governors and Trustees are expected to exercise common sense. If they are in any doubt they must consult the CEO, Head teachers, Board Chair or Chair of Governors and in every case declare the acceptance of a gift or hospitality in the register kept by the Engage Trust, using the 'Declaration of Gifts and Hospitality' form at Appendix B

The process set out is designed to safeguard everyone 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 Trust.
- Gifts should only be accepted in exceptional circumstances.
- The Code of Conduct applies to all Trustees, governors, and staff of the Engage Trust.
- To determine whether a gift or hospitality is acceptable, the 'PROVEIT' test should be applied at Appendix A.
- Registers are accessible for viewing by the following appropriate officers: Head teachers, Trustees, Governors, External Auditors, and Accounting Officer.
- Any request by a member of the public to view the Register of Declarations of Gifts and Hospitality will be referred to the CEO. In considering any request, the CEO will balance the requirement for the Trust to be open and transparent against the requirements of the Data Protection Act 1998.

2. Hospitality

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

- 1a) Staff and governors 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

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

1b) Care should be taken to avoid situations in which an individual is the sole person invited to partake of hospitality or where it creates a pattern of receiving hospitality from that organisation.

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

2a) Attendance at conferences, events and demonstrations of equipment organised by outside bodies where there is a service interest.

2b) Attendance at events or functions where there is a demonstrable need for the Trust to be represented to either give or to receive information or to participate as part of the Trust's corporate image.

2c) Attendance at events or functions which are part of the civic, cultural or sporting life of the Trust.

2d) Working lunches where this is an appropriate and effective way of conducting business and the refreshments provided are on a reasonable level.

3) Overnight hospitality linked to any of the above should be declared to the CEO 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 Trust as a corporate body or intended for an

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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, within 28 days of accepting any gift or hospitality, provide written notification to the Head teachers or CEO using the 'Declaration of Gifts and Hospitality' form. All offers accepted should be recorded in case of any queries, in particular through FOI requests.

The Declaration of Gifts and Hospitality forms (APPENDIX B) 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 Headteacher or CEO as to why acceptance of the offer is authorised;

The employee's/Trustee's/governor's printed full name and signature; and the Head teacher's or CEO's printed full name and signature

5. Monitoring

The Trust Business Director maintains a register of gifts and hospitality accepted. The Business Director will report annually the content of the register to the Trust Audit, Risk and Personnel Committee. Any concerns/issues identified should be noted and an action plan put in place

6. Penalties for breaching the Code

The Trust'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.

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8. Equality Impact

The Engage Trust has reviewed this policy for its impact on issues of equality. The policy has been considered in relation to the following protected characteristics

Gender

Disability

Sexual Orientation

Ethnicity

The Engage Trust has not identified any issues in relation to these protected characteristics and has carefully considered whether any element of this policy would adversely impact upon the equality of access or opportunity for any staff member or service user, and have been unable to identify any impact that would require mitigation

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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?

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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 or wish to declare a gift or hospitality please complete the form and return to the Business Director at Trust offices

Details of employee receiving gift or hospitality

Full Name	
Job Title	
SSSfN Site	
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	