

Gifts and Hospitality Policy

Academic Year 2022-2025



Version and Date		Action/Notes	Date Written	Date to be Reviewed
4.0	13.07.2021	Approved by Board of Trustees	July 2021	3 Years - July 2024
5.0	12.07.2022	Approved by Board of Trustees	July 2022	3 Years - July 2025

The intention of the policy is to ensure that the Connect Education Trust can demonstrate that no undue influence has been applied or could be said to have been applied by any supplier or anyone else dealing with the Trust. The Trust should be able to show that all decisions are reached on the basis of value for money and for no other reason. Any consideration of whether or not the principles of this Policy have been breached will be determined by reference to this provision.

Any breach of this policy could lead to disciplinary action and may constitute gross misconduct. Employees shall not use their authority or office for personal gain and shall seek to uphold and enhance the standing of the Trust.

All staff must:

1. Maintain an unimpeachable standard of honesty and integrity in all their business relationships.
2. Comply with the letter and spirit of the law, and contractual obligations, rejecting any business practice that might be deemed improper.
3. At all times in their business relationships acting to maintain the interests and good reputation of the Trust.
4. Any employee who becomes aware of a breach of policy must report this immediately to his or her manager who will instigate investigations as necessary.
5. Any personal interest that may impinge or might reasonably be deemed by others to impinge on an employee's impartiality or conflict with the duty owed to the Trust in any matter relevant to an employee's duties (such as conflicting business interests) should be declared in writing. Any member of staff who is aware of any business dealings conferring personal gain, or involving relatives or associates of members of staff must supply details of such transactions for entry into the Register of Business Interests.

The following general rules apply and must guide decisions on receipt of gifts as an employee of the Trust.

Gifts:

- To accept gifts should be the exception. You may accept small 'thank you' gifts of token value, such as a diary, a coffee mug or bunch of flowers, not over £25 in value. You should notify the Headteacher/ Chief Operations Officer of any gift or hospitality over this value for entry in the Register of Gifts and Hospitality.
- It is well-established practice within the education environment that employees may be presented with small tokens of appreciation, for example at festivals or at the end of a school year and this is acceptable. However, it is unacceptable to receive gifts on a regular basis from the same person or family, or to receive gifts that are of a significant value. There may be other occasions when it is appropriate to accept gifts (e.g. where refusal may offend) or where it may be difficult to return (e.g. if it is from an anonymous source). Therefore, it can sometimes be difficult to decide which offers can be accepted and which cannot. In these circumstances, any employee or worker must only accept occasional, token gifts that are clearly a small gesture of appreciation. If gifts from the same source become frequent (monthly or more) and/or are significant in value (over £25) this must be reported to the Headteacher/ Chief Operations Officer and recorded within the Register of Gifts and Hospitality.
- Always say "no" if you think the giver has an ulterior motive. Be sensitive to the possibility that the giver may think that even small gifts or simple hospitality will elicit a prompter service or preferential treatment.

- Never accept a gift or hospitality from anyone who is, or may be in the foreseeable future, tendering for any contract with the Trust, seeking employment with the Trust or is in dispute with the Trust, even if you are not directly involved in that service area.
- Where items purchased for the Trust include a 'free gift', such a gift should either be used for Trust business or handed to the Headteacher/ Chief Operations Officer to be used for charity raffles.
- If you are in doubt about the acceptability of any gift or offer of hospitality it is your responsibility to consult the Headteacher or the Chief Operations Officer.

Hospitality:

- A gauge of what is acceptable in terms of hospitality is whether this Trust would offer a similar level of hospitality in similar circumstances.
- Occasional working lunches with customers, providers or partners are generally acceptable as a way of doing business provided they are not to an unreasonable level or cost.
- Invitations to corporate hospitality events must each be judged on their merit. Provided the general rules have been considered, it may be acceptable to join other company/organisation guests at:
 - sponsored cultural and sporting events, or other public performances, as a representative of the Trust;
 - special events or celebrations.

Consider the number of these events, and always take into consideration what public perception is likely to be if they knew you were attending.

- Acceptability depends on the appropriateness of the invitations, in terms of the level of hospitality, the frequency and the status of the invited employee. In all such cases the Headteacher/ Executive Business Manager must be consulted.
- Paid holidays nor the use of company villas/apartments are not acceptable.
- If you are visiting a company to view equipment that the Trust is considering buying, you should ensure that expenses of the trip are paid by the Trust. Acceptance of refreshments and/or a working lunch may be acceptable, but care must be taken to ensure that the Trust's purchasing and/or tender procedures are not compromised.
- Acceptance of sponsored hospitality that is built into the official programme of conferences and seminars related to your work are acceptable.
- Offers to speak at corporate dinners and social gatherings, or events organised by, for example, a professional body, where there is a genuine need to impart information or represent the Trust must be agreed in advance with the Chief Executive. Where your spouse or partner is included in the invitation, and approval has been given for you to attend, it will be acceptable for your spouse or partner to attend as well, but if expenses are incurred, these will be met personally.
- Any invitation you accept should be made to you in your professional/working capacity as a representative of the Trust.