



Girls' Learning Trust

# GIFTS & HOSPITALITY POLICY

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Approved by Finance Committee:

June 2021

Next Review:

Every 3 years, or as the need arises

## **1. RATIONALE**

All members of staff, trustees and governors are public servants and as such must not use public monies or official business for personal benefit. Obtaining food and services that include elements of private use or accepting excessive hospitality and/or gifts is not permitted.

The intention of this policy is to ensure that the Girls' Learning Trust (the "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.

All members of staff, trustees and governors shall seek to uphold and enhance the standing of the Trust by maintaining honesty and integrity in all their business relationships and at all times acting to uphold the interests and good reputation of the Trust.

## **2. 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 general 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 general public.

## **3. RECEIPT OF GIFTS & HOSPITALITY**

The Trust expects all members of staff, trustees and governors to exercise utmost discretion when giving and accepting gifts and hospitality in their capacity as representatives of the Trust. Particular care should be taken when accepting gifts from a person or organisation that has, or is hoping to have, a contract with the Trust.

However, it is recognised that members of staff, trustees and governors may receive hospitality and/or gifts from time to time. In general, gifts and hospitality should not be accepted, except as provided for below. If in doubt, advice should be sought from the Director of Finance & Operations (DFO).

- Members of staff, trustees and governors 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 might be placed under an obligation.
- Isolated gifts of low value (up to £50) such as promotional calendars or diaries, or small tokens of gratitude including gifts from pupils, parents and guardians can be accepted. Gifts should not be accepted if they appear to be disproportionately generous or could be construed as an inducement to effect a business decision.
- Conventional hospitality (lunches, outings, tickets for events etc.) that is modest and reasonable in the circumstances may be accepted. Such invitations should not be accepted where there is no reasonable business justification for doing so, where an invitation is disproportionately generous, or where the invitation could be seen as an inducement to effect a business decision.
- Any gifts or hospitality valued at less than £50, and meeting the above criteria, can be accepted. Gifts or hospitality over £50 in value must be reported to the DFO for an entry in the Gifts & Hospitality Received Register. The entry must include the nature of the hospitality/gift, the date on which it was received, the name of the organisation/person who gave the hospitality/gift and its approximate value.

- If a member of staff, trustee or governor 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, it is their responsibility to discuss this with the DFO (similarly the DFO should raise concerns with the CEO, the CEO with the Chair of the Trust and the Chair with the Trust Board).
- Where purchased items include a “free gift”, such gifts should be either used for Trust business or handed to the Trust to be used at charity raffles etc. Where a gift is received on behalf of the school, the gift remains the property of the school.

#### **4. GIVING GIFTS & HOSPITALITY**

From time-to-time, it may be appropriate to use public money to reflect the school’s thanks and appreciation to members of staff, trustees and governing body members, and/or guest speakers/visitors.

For the avoidance of doubt, the Department of Education has made it clear that it regards all alcohol as ‘irregular expenditure’ i.e. not for the purposes identified for public money. In light of this, as a Trust, we will not purchase alcohol.

The arrangements for gifts and hospitality are as follows:

- To members of staff, the Trust will allocate £500 per year to each school (and a pro-rata amount to the GLT Shared Business Services functions) for the purposes of staff hospitality and celebration events. These will reflect the special characteristics and circumstances of the school, and will be managed at the discretion of the Headteacher (CEO/DFO in the case of Shared Business Services). In addition, from time-to-time, the Trust may also send small gifts to individual members of staff, capped at £50 per person, such as flowers on bereavement. This will be approved by the CEO, DFO or Headteacher.
- To trustees, governing body members and other volunteers that, in the opinion of the Trust Board, have made a significant contribution to the trust and who have completed at least one term of office (or at least 4 years in the case of volunteer), the Trust may make a gift up to a value of £50. This will be approved by the Chair or Vice Chair of the Trust Board.
- To guest speakers, school production volunteers, and other volunteers & visitors, the Trust may make a small gift to acknowledge the individual’s contribution, capped at £50 per person, such as flowers. This will be approved by the CEO, DFO or Headteacher.

#### **5. MONITORING**

This Gifts & Hospitality Policy will be published on the Trust website(s) in the interests of transparency and good governance.

Trust expenditure on gifts & hospitality will be monitored routinely through the accounts commentary submitted to Trust Finance Committee.

The contents of the Gifts & Hospitality Register will be reviewed at least annually by the Trust Finance Committee.

The Trust must be able to show that all decisions are reached on the basis of value for money considerations 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. Any employee, trustee or governor who becomes aware of a breach of this policy must report it immediately to the CEO, DFO or Headteacher, who will instigate investigations as necessary.

Any personal interest that may impinge, or might reasonably be deemed by others to impinge, on an employee, trustee or governor's impartiality or conflict with the duty owed to the Trust in any matter relevant to the individual's duties (such as conflicting business interests) should be declared in writing. Anyone 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 two registers will be held centrally by the DFO on behalf of the Trust:

- Register of Business Interests, and
- Gifts & Hospitality Register (including Gifts & Hospitality given & received where the amounts involved are greater than £50 in value).