



HOPE LEARNING COMMUNITY

Gifts and Hospitality policy.

Hope Learning Community

Gifts and Hospitality Policy

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1. General

- 1.1 This is Hope Learning Community's (The Trust) approved Code of Conduct relating to the offer and/or acceptance by employees of gifts and hospitality of whatever nature from outside individuals or organisations.
- 1.2 Within the terms of the Code, employees, Trustees and governors are expected to exercise common sense. If they are in any doubt they must consult the Chief Executive Officer and Chair of Board of Trustees and in every case declare the acceptance of a gift or hospitality in the register kept by the Academy Trust, using the Academy's 'Declaration of Gifts and Hospitality' form.
- 1.3 The process set out is designed to safeguard Trustees, governors and employees 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, governors and employees of The Trust
- To determine whether a gift or hospitality is acceptable, the 'PROVEIT' test should be applied by employees and referred to the Chief Executive Officer if in doubt. See **Appendix 1**.
- Registers are accessible for viewing by the following appropriate officers: Trustees, Governors, Headteachers, Chief Finance Officer, 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 CEO. In considering any request, they will balance the requirement for the Academy Trust to be open and transparent against the requirements of the Data Protection Act 2018.

2. Hospitality

- 2.1 The following principles should be followed in deciding whether or not to accept hospitality: -
 - Employees 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 person or organisation offering the hospitality, its scale and nature, and its timing in relation to decisions to be made by the Academy.
 - Care should be taken to avoid situations in which an individual trustee, governor or employee is the sole person invited to partake of hospitality or where it creates a pattern of receiving hospitality from that organisation.

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

- Attendance at conferences, events and demonstrations of equipment organised by outside bodies where there is a service interest.
- 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 Trust's corporate image.
- Attendance at events or functions which are part of the civic, cultural or sporting life of the The Trust.
- Working lunches where this is an appropriate and effective way of conducting business and the refreshments provided are on a reasonable level.

2.3 Overnight hospitality linked to any of the above should **not** be 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.

3.1 Gifts of the following type may be accepted: -

- modest gifts of a promotional character, e.g. calendars, diaries and other similar articles. See also point 4; and
- gifts on the conclusion of any courtesy visit to an outside organisation of a sort normally given by that organisation.
- Individual Gifts up to £50 in value or gifts from the same person/organisation that reach a total value of £50 in a rolling 12 month period.

3.2 Gifts which are intended for The Trust as a corporate body can be accepted but must not be retained by the individual who receives them. Such gifts should be passed to The Trust as appropriate.

4. Registration of Gifts and Hospitality

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

4.2 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 as to why acceptance of the offer is authorised;

5. Monitoring

- 5.1 The Trust requires each school to maintain a register of gifts and hospitality accepted.
- 5.2 The pro-forma, detailing the individual declarations, should be obtained and returned to the Director of Governance and Compliance at the start of each term
- 5.3 The Trust monitors the Register annually and reports the outcome to the Finance, Audit and Risk Committee. Any concerns/issues identified should be noted and an action plan put in place.

6. Penalties for breaching the Code

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

7. Full Board of Trustees – Monitoring of the Code

- 7.1 As part of its role in promoting high standards of conduct, the Finance and Audit Committee will receive annual reports on the monitoring of the Code.

8. Retention of Documentation

Documentation in the Register will be kept for seven years.

APPENDIX 1

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 2: gifts and hospitality register

DATE	NAME	DESCRIPTION OF GIFT/HOSPITALITY AND APPROXIMATE VALUE	PARTY OFFERING GIFT/HOSPITALITY	ACCEPTED /REJECTED	APPROVED BY