

## Gifts and Hospitality Policy

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## Monitoring and review

Staff responsible	:	Chief Finance Officer
Committee responsible	:	Finance and Resources Committee
Links	:	
Date approved	:	March 2018
Review date*	:	March 2020

\*Please note that should any further national guidance be issued by external agencies that are relevant to this policy, it will be updated accordingly prior to the review date shown above and re-circulated.

**The Boleyn Trust Board of Trustees has agreed to this Policy and, as such, it applies to all Schools within the Trust.**

## Rationale

The Boleyn Trust with all its constituent schools is committed to the highest level of integrity, honesty and accountability in all its business dealings. All trustees, staff, directors and councillors are expected to maintain high standards of propriety and professionalism in all their dealings, ensuring they are free from any conflict of interest through their business in the name of the Trust.

### Definitions

A Gift is any item or service which is received free of charge; or personally offered at a discounted rate or on terms not available to the general public.

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.

Prevention of Fraud and Bribery Act 2010 makes it a criminal offence to:

- Offer, promise or give a bribe,
- Request, agree to or accept a bribe, (by an organisation) fail to prevent bribery by those acting on its behalf ('associated persons') to obtain or retain business or a business advantage for the organisation.

Under this act, a bribe is 'a financial or other advantage' offered, promised or given to induce a person to perform a relevant function or activity improperly, or reward them for doing so.

## Policy Statement

In order to protect all adults involved with the trust, and the reputation of the trust from accusations of bribery or corruption staff must take extreme care that none of their dealings, directly, or indirectly, could be deemed as a reward or benefit, in line with the Bribery act 2010. This act makes it a criminal offence.

The trust will hold a Gifts and Hospitality Register (**Annex 1**).

It is common for appreciative parents and students/pupils to register their thanks for the work of staff in the form of a small personal gift. If these are valued at less than £30 these are perfectly acceptable with reference to senior members of staff. These will not need to be added to the register.

Hospitality in the form of working lunches, coffees etc. are perfectly acceptable, and it would be appropriate to offer this to gain cordial relationships in support of good relationships with visiting staff or business colleagues. These would not be added to the register.

If a member of staff 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 trust other than light refreshments, it is their responsibility to discuss this with the Chief Operating Officer before accepting such benefit within 5 days. If acceptable, this would need adding to the register.

If not accepting a gift would be regarded as causing offence, (such as a sudden and unexpected gift, or one where it would cause cultural offence) the item should be accepted. The matter should then be brought to the attention of the Chief Executive Officer as soon as possible who may decide to return the gift, discuss it with the Chair of Board of Trustees, or/and may donate it to a trust raffle/ fair or a charitable cause.

Examples of gifts or hospitality that should not be accepted are cash or monetary gifts; gifts or hospitality offers to a member of your family; gifts or hospitality from a potential supplier or tendered in the immediate period before tenders are invited or during the tender process. Where a gift is received on behalf of the trust, the gift remains the property of the trust.

All gifts/hospitality over the value of £30 must be recorded in the trust's Gift and Hospitality Register, whether accepted or not.

### Instances of non-compliance

In the case where it is believed a member of staff, trustee, or local governor has not declared a gift or hospitality, then

a formal investigation will be instigated by the Chief Operating Officer /Chair of the Trust Board. This may take the form of disciplinary procedures in the case of employees if misconduct is indicated.

