

## Gifts and Hospitality Policy

Cheshire Academies Trust is committed to the highest level of integrity, honesty and accountability in all its business dealings. All trustees, staff and governors 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 Academy 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 its schools from accusations of bribery or corruption, Trustees, Governors and 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.

Each school holds a Gifts and Hospitality Register

It is common for appreciative parents and 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 without reference to senior members of staff. These will not need to be added to the register.

Where a more valuable gift, benefit or service is offered which is to the good of the school, rather than an individual, then it must be referred to the Head of School and if in the case of the Head of School, to the Chair of Governors for approval within their discretion. In case of these items, if acceptable, should 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 school other than light refreshments, it is their responsibility to discuss this with the Head of School 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 Head of School as soon as possible who may decide to return the gift, discuss it with the Chair of Governors, or/and may donate it to a school 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 school or Trust, the gift remains the property of the school/Trust. All gifts/ hospitality over the value of £30 must be recorded in the Gift and Hospitality Register, whether accepted or not.

#### Instances of non-compliance

In the case where it is believed a member of Staff, Trustees or Governors has not declared a gift or hospitality then a formal investigation will be instigated by the Head of School/Chair of Governors/Board. This may take the form of disciplinary procedures in the case of employees if misconduct is indicated.

This policy was approved as part of the Finance Handbook by the CAT Board of Trustees at their meeting on 21 April 2015. It will be reviewed in the Summer Term 2016

Signed



Chair of Trustees

