

Gifts & Hospitality Policy

RIDGEWAY EDUCATION TRUST

Approved by the Trust Board 06 October 2020

Review date: October 2022

Gifts and Hospitality Policy

Introduction

- Gifts, hospitality or other personal benefits (hereinafter referred to as Gifts) should not be accepted or offered by any member of staff, trustee or governor, except as provided for below.
- The intention of the Policy is to ensure that Ridgeway Education Trust (RET) can demonstrate that no undue or improper influence has been applied, or could be perceived to have been applied, by any supplier or anyone else dealing with it. RET must be able to show that all decisions, whether educational, financial or otherwise are reached on the basis of the proper application of laid-down procedures and for no other reason.
- The reputation of RET and the personal reputation of any individuals involved may be seriously affected if a gift is inappropriately accepted or offered. It is a criminal offence to demand or accept a gift or reward in return for being influenced as part of RET.
- Any breach of this Policy could lead to disciplinary action and may constitute gross misconduct.

Definitions

- A gift is any item, cash, goods, service or benefit in kind given or offered for which no payment or service was given or received in return. It includes any goods or services offered at a discounted rate or on terms not available to the general public.
- Hospitality is the offer of any food, drink, accommodation or entertainment provided free of charge or heavily discounted. It includes the opportunity to attend any cultural or sporting event on terms not available to the general public.
- Staff is taken to mean all permanent and fixed term staff employed by RET and by any other contractors, consultants or other persons (including trustees and governors) acting under RET's name.

The Receipt of Gifts

- RET encourages and expects staff, trustees and governors to use their networks and contacts for its benefit. It is however a fundamental requirement on all staff, trustees and governors, the contravention of which would be considered to be gross misconduct, that they must not derive any personal financial benefit beyond their agreed remuneration (if any) from the decisions they make or contribute to, which involve the education of students, or the spending of the significant sums of public money that are entrusted to RET. Staff, trustees and governors shall not use their authority or office for personal gain beyond their agreed remuneration and shall seek to uphold and enhance the standing of RET by:
 1. maintaining an unimpeachable standard of honesty and integrity in all their business and other relationships complying with the letter and spirit of the law in contractual obligations.

2. rejecting any business practice that might be deemed improper at all times in their business and other relationships.
 3. acting in a manner that maintains the interests and good reputation of RET.
- Any employee who becomes aware of a breach of Policy must refer to RET's Whistleblowing Procedure and report the alleged breach immediately to his or her line manager who will instigate investigations as necessary. In circumstances where the alleged breach involves the line manager, any employee has alternative reporting routes available as set out in the Whistleblowing Procedure.
 - Any personal interest that may impinge, or might reasonably be deemed by others to impinge, on an employee's, trustee's or governor's impartiality, or conflict with the duty owed to RET in any matter relevant to an employee's, trustee's or governor's duties (such as conflicting business interests) shall be declared in writing. Any member of staff, trustee or governor who is aware of any business dealings conferring personal gain, or involving their relatives or associates must make an appropriate entry in the Register of Business Interests.
 - Staff, trustees and governors are permitted to accept gifts, rewards or benefits from students, students' families, members of the public, or organisations which RET has official contacts with, only where they are isolated gifts of a trivial character, or inexpensive seasonal gifts (such as chocolates, flowers, wine, diaries or calendars). Therefore, gifts should not be accepted if they appear to be disproportionately generous, or could be construed as an inducement to effect a decision or action, whether business, educational, or other
 - Staff must base all purchasing decisions and negotiations for contracts solely on achieving best value for money.
 - Where purchased items include a 'free gift', such a gift should be either used for academy business or handed to RET to be used at charity raffles, pupil prizes, etc.
 - Staff, trustees and governors are not entitled to use personal 'loyalty cards' when purchasing on behalf of RET.
 - Hospitality such as working lunches, coffees etc are perfectly acceptable where it is appropriate to offer or receive these in support of good relationships with visiting staff or business colleagues. Modest hospitality, provided it is reasonable in the circumstances, should be similar to the scale of hospitality which RET as an employer would be likely to offer. These would not be added to the register. Hospitality received above this level should be recorded in the register.
 - Any hospitality, other than of a nominal value, or facilities provided during the normal course of business, should be reported to the Executive Headteacher, Headteacher or the Trust Board Chair (through the Company Secretary) as appropriate and at the earliest opportunity.
 - Any gift or hospitality which is more than just a token, defined as a having a value of more than £25, should be politely refused or returned. The prior written approval of the Executive Headteacher or Headteacher must be obtained prior to accepting something

which has more than this value and only in exceptional circumstances.

- The following must never be accepted:
 - Gifts of cash or monetary gifts
 - Gifts or hospitality offered to the husband, wife, partner, family member or friend of the member of staff, trustee or governor
 - Gifts or hospitality from a potential supplier or tenderer in the immediate period before tenders are invited or during the tender process
 - Lavish or extravagant gifts or hospitality, even if they relate to activities in the individual's own time.
- Any gift or hospitality, which have a value of more than £25, must be recorded in RET's Gifts and Hospitality Register, even if they are not accepted. The Gifts and Hospitality Register is maintained by the PA to the Headteacher (DGS and SBS) or the School Business Partner (SCCEPS) for staff, and by the Clerk to the Local Governing Body (Trust Governance Officer) for trustees and governors.

The Providing of Gifts

- RET encourages and seeks co-operative relationships between staff, trustees, governors, stakeholders and external organisations. Accordingly there can be occasions where it is appropriate for RET to provide and fund limited gifts, in particular hospitality, which will principally be dealt with in-house. Likewise it may be appropriate for leaving gifts to be provided to staff leaving the employment of RET, particularly after a long period of service. Such gifts can be supplemented with private contributions from continuing members of staff. Gifts may also be provided to staff in respect of sickness, bereavement, marriage, civil partnership or those celebrating the birth of a child. All gifts will only be given with the authorisation of the Executive Headteacher or Headteacher up to a maximum value of £25 per individual gift, not including the value of postage which may be an additional cost, unless agreed otherwise by the Chair of Finance & General Purposes Committee. Any such gifts will be purchases from unrestricted funds.
- Alcohol purchases are considered irregular within the Education & Skills Funding Agency Academies Accounts Direction. In the light of this no purchases of alcohol must be made by the Trust or its schools.
- Given the nature of the professional responsibilities of staff, they must not give gifts/hospitality to students.
- RET may award gifts/prizes etc. related to the achievement of students although these will be modest and will not exceed a maximum value of £20 for any individual reward or prize.

Non Compliance

- In any case where it is believed a member of staff, trustee or governor has not declared a gift or hospitality then a formal investigation will be instigated by the Executive Headteacher. If misconduct is indicated, this may take the form of disciplinary procedures in the case of employees and may lead to trustees and governors being removed from office and disqualified as directors.