

<b>The Cam Academy Trust GIFTS AND HOSPITALITY POLICY</b>	
<b>Approved in consultation with the Audit &amp; Risk Committee on behalf of the Trust Board</b>	July 2018 Feb 2023
<b>To be reviewed:</b>	Every 2 years or as appropriate
<b>Reviewed:</b>	February 2023
<b>Date of next review:</b>	February 2025
<b>Responsible Officer:</b>	Director of Finance & Operations - M. Norman
<b>Category – 1</b>	<b>Version – 2</b>

This policy gives guidelines on the types of gifts that are acceptable and on the types of hospitality that schools can provide.

### **Receipt of gifts, hospitality, entertainment and other favours**

The Trust depends on its employees, Trustees and governors to ensure that the highest standards of ethical conduct are maintained in its business dealings.

This policy refers to individual schools and governing bodies. The Trust maintains a central Trust register of gifts and favours offered and whether these were accepted or rejected. This policy therefore applies equally to Trustees who report gifts and favours offered, accepted or rejected, to the Director of Finance and Operations

Each school maintains a register of gifts and favours offered and whether these were accepted or rejected. The employee or governor is required to report offers to the school's anti-corruption and bribery officer (or equivalent) promptly and, in any event, so that the register can be completed within seven days of the offer being made. The register is presented to the governing board on a termly basis.

Employees and governors should report any incidents of suspected bribery to the school's anti-corruption and bribery officer at the earliest possible time that a concern is identified. These may include:

Suspected or actual attempts at bribery for the employee or governor.

Concerns that other employees or governors may be being bribed.

Concerns that other employees or governors may be bribing third parties.

The school will immediately carry out a thorough investigation and take appropriate action if the allegations are proven, including reporting any matter to the relevant authorities.

Governors and members of staff involved in making buying decisions may not accept excessive (as a guide £25), frequent or regular gifts, hospitality, entertainment or other services from existing or prospective suppliers.

They may not receive hospitality in the form of holidays or weekends away, tickets to theatres or other entertainment events or the use of company flats, hotel suites or hospitality boxes at sporting and other events unless prior consent has been given by school Principal/Headteacher or CEO as appropriate.

They must exercise extreme caution where any gift and/or hospitality is offered by a person or organisation seeking to do business with the school. When considering whether to accept such offers, they must consider whether these could affect their independence or cause concern that they might affect their independence and report the offer to the school's anti-corruption and bribery officer before acceptance.

A 'trivial gift' or modest gift of a promotional nature given to a wide range of people and not uniquely to one individual may be deemed as acceptable. Such gifts may include calendars, diaries, pens or other small items and do not need prior approval for acceptance. They also do not need to be recorded in the gifts and hospitality register.

### **Expenditure on hospitality and gifts**

The school allows expenditure on hospitality provided that it is:

Arranged in good faith.

Not offered, promised or accepted to secure an advantage for the school or any of its employees or associated persons or to influence the impartiality of the recipient.

Employees should submit requests for such expenditure to the anti-corruption and bribery officer (with a copy to the school bursar for budgetary reasons), detailing:

The objective of the proposed expenditure.

The identity of those who will be attending, in the case of an event.

Details and the rationale of the proposed activity.

Expenditure will only be authorised where the anti-corruption and bribery officer considers that:

No conflict of interest may arise.

It could not be perceived that undue influence or a business benefit was being sought.

Such expenditure is reported to the full governing body and the school maintains a register of expenditure incurred.

### **Business entertaining**

It is recognised that there is a legitimate business need, on occasions, for representatives of the school to entertain or provide hospitality to official visitors to the school.

When entertaining official visitors, the representation from the school should not be disproportionate to those being entertained. There should be more external guests than school employees at any one event and only essential employees should attend.



Water, teas, coffees and other refreshments, including light lunches or a modest dinner are a permissible expense when providing hospitality to external visitors to the school, or candidates for interview. In-house catering provision will be used wherever possible.

Hospitality costs must be authorised by the Headteacher/Principal in advance, who should record the reason why they feel this provides value for money to the school. The costs should be kept to a minimum and paid for through private/unrestricted funds.

The following information must be provided to support the claim:

The names of the attendees.

The organisation which they represent.

The purpose of the entertainment.

The reason why the Principal/Headteacher believes this provides value for money to the school.

### **Staff entertaining**

School funds must not be used:

To provide hospitality or meals for staff.

To purchase food or beverages at restaurants or hotels for school staff and/or their families.

Where school staff are on residential training courses, personal expenditure incurred during an overnight stay such as alcohol, newspapers, private telephone calls etc., must be paid for before departure by the employee and cannot be reclaimed from the school.

### *Purchase of alcohol*

School funds may not be used for the purchase of alcohol.

### *Expenditure on gifts*

The purchase of gifts, using school funds, is not permitted. These must be covered by private collections made from employees and governors.





## REGISTER OF GIFTS AND/OR HOSPITALITY

**SCHOOL:** \_\_\_\_\_

Please use this sheet to record **any** gift or hospitality received from dd/mm/yy

Date upon which the Gift and/or Hospitality was offered/received	Person/Organisation offering or providing the Gift and/or Hospitality	Brief details of gift and/or Hospitality offered/received	Estimated or actual value of the Gift and/or Hospitality	Any reasons for accepting the Gift and/or Hospitality
18/10/18	Jolce	M&S Fruit basket (J. Berridge)	£30	For work done on toilets at CVC
05/11/18	SSAT	Evening meal at SSAT Conference - (S. Munday)	£100	As a guest of S. Williamson – SCM also sits on SSAT board
03/07/22	Youth Sport Trust	2 tickets for Wimbledon (Centre Court)	£240 (if purchased from Wimbledon, if possible to secure)	The YST is given tickets by sporting bodies for events due to the work that YST does nationally. It then gives these tickets to those who do work for them. Work has been done for the TST to support its developing work with multi-academy trusts.



Name of Person: ..... Date placed on Register: .....