



Gifts and Hospitality Policy

[Insert academy logo]

[Insert academy name]

Version 2.0 – March 2017

Next review: Spring 2018

This policy is a mandatory policy for all Vine Academies and must be implemented with no amendments.

Gifts and Hospitality Policy

The Vine Schools Trust	
Approved by:	The Vine Schools Trust
Signature:	Philip Preston (Chairman)
Date:	31 March 2017

[Name of Academy]	
Approved by:	Full Governing Body
Signed (Chair of Local Governing Body)	
Date:	

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Version History

Version	Date	Details
2017 v2.0	Spring 2017	Updated for Annual Renewal
2014 v1.1	May 2016	Annual Renewal

Current Version Change Log

Page	Section	Details
8	Appendix A	A nil return is required annually

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GIFTS & HOSPITALITY POLICY

1.0 General

- 1.1 This is the Academy's approved Code of Conduct relating to the offer and/or acceptance by staff, governors and directors of gifts and hospitality of whatever nature from outside individuals or organisations.
- 1.2 Within the terms of the Code, staff and governors are expected to exercise common sense. If they are in any doubt they must consult the Director of Finance and Local Chair of Governors. For trust staff, governors and directors it must be the Chairman of the Trust Board. In every case declare the acceptance of a gift or hospitality in the register kept by the Academy, using the Academy's 'Declaration of Gifts and Hospitality' form. See Appendix A.
- 1.3 The process set out is designed to safeguard governors and staff from any misunderstanding or criticism.
- 1.4 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 governors, and staff of the Academy.
- 1.5 Registers are accessible for viewing by the following appropriate officers:
 - Headteacher
 - Governors
 - Director of Finance
 - Chairman of the Trust Board
 - External Auditors
 - Responsible Officer
- 1.6 Any request by a member of the public to view the Register of Declarations or Gifts and Hospitality will be referred to the Chairman of the Trust Board or Director of Finance. In considering any request, they will balance the requirement for the Academy to be open and transparent against the requirements of the Data Protection Act 1998.

2.0 Hospitality

- 2.1 The following principles should be followed in deciding whether or not to accept hospitality:-
 - 2.1.1 Staff, directors 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.
 - 2.1.2 Care should be taken to avoid situations in which an individual governor, director or member of staff 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:-
 - 2.2.1 Attendance at conferences, events and demonstrations of equipment organised by outside bodies where there is a service interest.
 - 2.2.2 Attendance at events or functions where there is a demonstrable need for the Academy to be represented to either give or to receive information or to participate as part of the Academy's corporate image.
 - 2.2.3 Attendance at events or functions which are part of the civic, cultural or sporting life of the Academy.
 - 2.2.4 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 be declared to either the Headteacher, Local Chair of Governors or Chairman of the Trust Board (as appropriate) before being accepted.

3.0 Gifts

- 3.1 All personal gifts should be refused or donated to charity unless they come within the categories set out in 3.2.1, 3.2.2 or 3.2.3 below.
- 3.2 Gifts of the following type may be accepted:-
 - 3.2.1 Modest gifts of a promotional character, e.g. calendars, diaries and other similar articles.
 - 3.2.2 Gifts on the conclusion of any courtesy visit to an outside organisation of a sort normally given by that organisation.
 - 3.2.3 Gifts up to £10.00 in value
- 3.3 Gifts which are intended for the Academy Trust or any of its member schools can be accepted but must not be retained by the individual who receives them. Such gifts should be passed to the Academy as appropriate.

4.0 Registration of Gifts and Hospitality

- 4.1 Staff must, within 28 days of accepting any gift or hospitality, provide written notification to the Headteacher using the 'Declaration of Gifts and Hospitality' form. All offers accepted should be recorded in case of any queries, in particular through Freedom of Information (FOI) requests.
- 4.2 Governors, members of the Senior Leadership Team, central trust staff and directors must, within 28 days of accepting any gift or hospitality, provide written notification to the Chair of the Trust Board using the 'Declaration of Gifts and Hospitality' form. All offers accepted should be recorded in case of any queries, in particular through FOI requests.
- 4.3 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:
 - 4.3.1 estimated or actual value;
 - 4.3.2 an indication from the Headteacher/Chairman of the Trust Board as to why acceptance of the offer is authorised;
 - 4.3.3 the employee's/governor's printed full name and signature; and
 - 4.3.4 the Headteacher's/Chairman of the Trust Board's printed full name and signature.
- 4.4 Notwithstanding sections 4.1 and 4.2 above, **all Academy and Trust staff, governors and directors must complete a declaration at least annually, nil returns are required.**

5.0 Monitoring

- 5.1 The Director of Finance maintains a central register of gifts and hospitality accepted.
- 5.2 The Director of Finance will report annually the content of the register to the Finance Committee. Any concerns/issues identified should be noted and an action plan put in place by the Governing Body/Board of Directors.

6.0 Penalties for breaching the Code

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

7.0 Retention of Documentation

- 7.1 Documentation in the Register will be kept for seven years.

8.0 Review of Policy

- 8.1 The policy will be reviewed annually or sooner if warranted by internal or external events or changes. The Board of Trustees must approve all changes.

Appendix A

Declaration of Gifts and Hospitality Form

Receiving benefits, gifts, rewards or hospitality in return for providing services (even if these services are part of a usual role) can be perceived as an inducement to show favour to a person or organisation in his or her official capacity. Staff are advised to decline such offers, but it is acknowledged that there may be occasions when this is not feasible.

If you have received or wish to declare a gift or hospitality please complete the form and return to the Trust as outlined in 4.1 and 4.2 above.

Details of employee receiving gift or hospitality

Full Name	
Job Title	
School/Establishment	
Date of Declaration	
Signature	

Description of gift or hospitality

Description of gift / hospitality	
Value/estimated value of gift or hospitality	
Purpose of the offer	
Person/organisation providing the gift or hospitality	
Relationship to the person/organisation offering the gift or hospitality	
Acceptance of gift / hospitality	Yes / No
Reason for acceptance	

Nil Return – cannot be greater than 12 months

Period Covered	
Signature and Date	

Approved by

Signature	
Date	
Name	
Job Title/Position	