Diocese of Chelmsford Vine Schools Trust

Gifts and Hospitality Policy 2019-2020

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

**"I am the vine; you are the branches.
If you remain in me and I in you, you will bear much fruit"
(John 15:5)**

The Diocese of Chelmsford Vine Schools Trust is a company limited by guarantee.
Registered in England No 8709542. Registered Office 53, New Street Chelmsford CM1 1AT

The Diocese of Chelmsford Vine Schools Trust	
Approved by:	The Diocese of Chelmsford Vine Schools Trust
Signature:	Tim Rose (Chairman)
Date:	20th September 2019

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

Policy Reference:	F004
Version No:	V2.3 – 20 September 2019
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INSERT SCHOOL LOGO and Vision Statement

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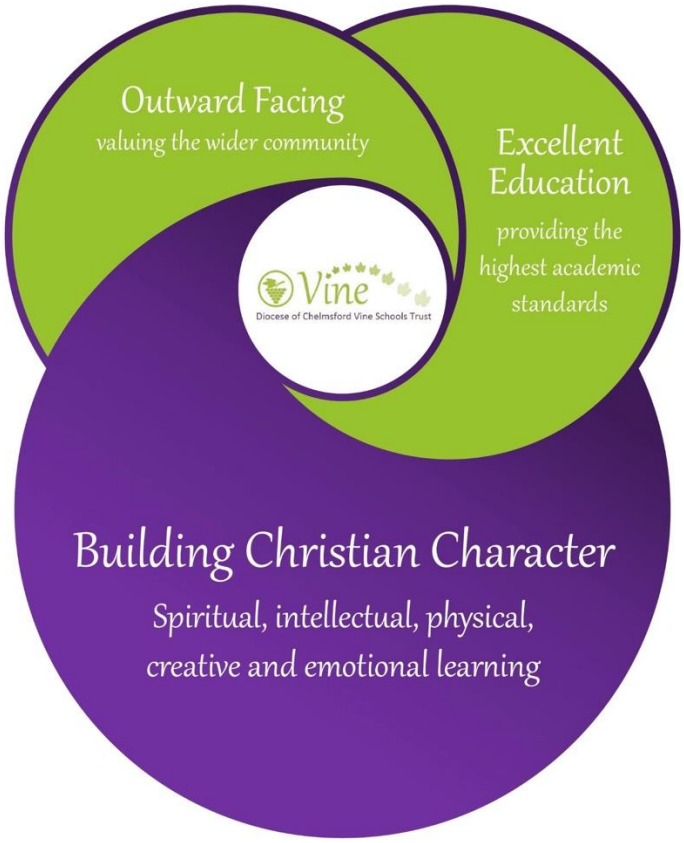
Vision & Values

V	**Valuing every person**
I	**Inspiring great teaching**
N	**Nurturing academic excellence and Christian Character**
E	**Excelling, unlocking great potential**



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CONTENTS **PAGE NO:**

1. Introduction 6
2. General Principles and Definitions 6
3. Hospitality 7
4. Gifts 7
5. Registration of Gifts and Hospitality 8
6. Monitoring and Reporting 8
7. Instances of non-compliance 8
8. Retention of Documentation 8
9. Review of Policy 8

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Version History

Version	Date	Details
2019 v2.3	Sep 2019	Re branded front sheet – content unchanged
2019 v2.2	Sep 2019	Annual Renewal
2018 v2.1	July 2018	Updated following annual review
2017 v2.0	Spring 2017	Updated for Annual Renewal
2014 v1.1	May 2016	Annual Renewal

Current Version Change Log

Page	Section	Details

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1. Introduction

The Diocese of Chelmsford Vine Schools Trust is committed to the highest levels of integrity, honesty and accountability in all its business dealings. All trustees (Directors), staff and local governors are expected to maintain high standards of propriety and professionalism in all their dealings, ensuring they are free from conflict of interest through their business in the name of the Academy Trust.

This document sets out the Trusts approach to Gifts and Hospitality.

2. General Principles and Definitions

2.1 This is the Academy's approved Code of Conduct relating to the offer and/or acceptance by staff, local governors and directors of gifts and hospitality of whatever nature from outside individuals or organisations.

2.2 Within the terms of the Code, staff, governors and directors 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, local 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.

2.3 The process set out is designed to safeguard directors, local governors and staff from any misunderstanding or criticism.

2.4 The general principles which govern gifts and hospitality are:-

2.4.1 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, gifts should only be accepted in exceptional circumstances.

2.4.2 **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, Offers of hospitality should only be accepted if there is a genuine need to represent the Academy or Trust.

2.4.3 The Code of Conduct applies to all local governors, staff and Directors of the Academy Trust.

2.5 Registers are accessible for viewing by the following appropriate officers:

2.5.1 Executive Headteacher / Headteacher

2.5.2 Local Governors

2.5.3 Director of Finance

2.5.4 Chairman of the Trust Board

2.5.5 Accounting Officer (CEO) and Chief Financial Officer (COO)

2.5.6 External Auditors

2.5.7 Responsible Officer

2.6 Any request by a member of the public to access the Register of Declarations or Gifts and Hospitality must be made by way of a Freedom of Information request, enquiries should be made via foi@vineschoolstrust.org.

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3. Hospitality

3.1 The following principles should be followed in deciding whether or not to accept hospitality:-

3.1.1 Staff, directors and local 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.

3.1.2 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.

3.2 Examples of when it may be proper to accept hospitality (always depending upon the particular circumstances) are as follows:-

3.2.1 Attendance at conferences, events and demonstrations of equipment organised by outside bodies where there is a service interest.

3.2.2 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.

3.2.3 Attendance at events or functions which are part of the civic, cultural or sporting life of the Academy.

3.2.4 Working lunches where this is an appropriate and effective way of conducting business and the refreshments provided are on a reasonable level.

3.3 Overnight hospitality linked to any of the above should be declared to the Executive Headteacher/Headteacher, Local Chair of Governors or Chairman of the Trust Board (as appropriate) before being accepted.

4. Gifts

4.1 All personal gifts should be refused or donated to charity unless they come within the categories set out in 4.2.1, 4.2.2 or 4.2.3 below.

4.2 Gifts of the following type may be accepted:-

4.2.1 Modest gifts of a promotional character, e.g. calendars, diaries and other similar articles.

4.2.2 Gifts on the conclusion of any courtesy visit to an outside organisation of a sort normally given by that organisation.

4.2.3 Gifts up to £25.00 in value.

4.3 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.

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5. Registration of Gifts and Hospitality

5.1 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.

5.2 Local 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.

5.3 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:

- 5.3.1 estimated or actual value;
- 5.3.2 an indication from the Executive Headteacher/Headteacher/Chairman of the Trust Board as to why acceptance of the offer is authorised;
- 5.3.3 the employee's/local governor's printed full name and signature; and
- 5.3.4 the Executive Headteacher's/Headteachers's/Chairman of the Trust Board's printed full name and signature.

5.4 Notwithstanding sections 5.1 and 5.2 above, **all Academy and Trust staff, local governors and directors must complete a declaration at least annually, nil returns are required.**

6. Monitoring and Reporting

6.1 The Director of Finance maintains a central register of gifts and hospitality accepted.

6.2 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 Local Governing Body/Board of Directors.

6.3 All data will be collected, held and processed in accordance with the Trust's data protection policy/policy on processing special categories of personal data. Any publication of data will preserve anonymity.

7. Instances of non-compliance

7.1 In the case where it is believed that a member of staff, local governor or director has not declared a gift or hospitality then a formal investigation will be instigated by the Executive Headteacher/Headteacher, Chair of Local Governing Body/Board, Chair of the Audit Committee or Chair of the Audit Committee's nominated director.

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

8. Retention of Documentation

8.1 Documentation in the Register will be kept for seven years.

9. Review of Policy

9.1 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.

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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 5.1 and 5.2 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	

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