

GIFTS AND HOSPITALITY POLICY

Presented to Finance & Resources/Audit and Risk Committee on Wednesday 30th April 2014
Ratified Board of Directors on 17th June 2014

THIS DOCUMENT TO BE REVIEWED ON A BIENNIAL BASIS

For: The Giffard Catholic Primary Academy and Nursery
SS Mary and John's Catholic Primary Academy
St Michael's Catholic Primary Academy and Nursery
St Teresa's Catholic Primary Academy
St Edmund's Catholic Academy

Date of Approval: 30th April 2014
Date to be reviewed: April 2016



1. General

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

Within the terms of the Code, staff and Academy Representatives/Directors are expected to exercise common sense. If they are in any doubt they must consult the Principal/Chair of Local Academy and 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.

The process set out is designed to safeguard Academy Representatives/Directors and staff from any misunderstanding or criticism.

The general principles which govern gifts and hospitality are:

- 1.1 Offers of hospitality should only be accepted if there is a genuine need to represent the Academy.
- 1.2 Gifts may be accepted outside these principles in exceptional circumstances.
- 1.3 The Code of Conduct applies to all Directors/Academy Representatives and staff of Bishop Cleary Catholic Multi Academy Company
- 1.4 To determine whether a gift or hospitality is acceptable, the 'PROVEIT' test should be applied by staff and referred to the Principal/Chair of Academy Representatives if in doubt. See Appendix A.
- 1.5 Registers are accessible for viewing by the following appropriate officers: Principal, Directors, Academy Representatives, Business Director and External Auditors.
- 1.6 Any request by a member of the public to view the Register of Declarations of Gifts and Hospitality will be referred to the Principal. In considering any request, the requirement for the Academy to be open and transparent will be balanced against the requirements of the Data Protection Act 1998.

2. Hospitality

The following principles should be followed in deciding whether or not to accept hospitality.

- 2.1. Staff and Directors/Academy Representatives 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.

- 2.2 Care should be taken to avoid situations in which an individual Director or Academy Representative 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.
- 2.3 Examples of when it may be proper to accept hospitality (always depending upon the particular circumstances) are as follows:-
 - 2.3.1 attendance at conferences, events and demonstrations of equipment organised by outside bodies where there is a service interest;
 - 2.3.2 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;
 - 2.3.3 attendance at events or functions which are part of the civic, cultural or sporting life of the Academy;
 - 2.3.4 working lunches where this is an appropriate and effective way of conducting business and the refreshments provided are on a reasonable level.

3. Gifts

All personal gifts should be refused or donated to charity unless they come within the categories set out in 3.1 or 3.2 below.

- 3.1 Gifts of the following type may be accepted:
 - 3.1.1 modest gifts of a promotional character, eg calendars, diaries and other similar articles. See also point 4;
 - 3.1.2 gifts on the conclusion of any courtesy visit to an outside organisation of a sort normally given by that organisation.
 - 3.1.3 gifts up to **£10** in value.
- 3.2 Gifts which are intended for the Academy as a corporate body or intended for the Academy 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. Registration of Gifts and Hospitality

Staff must, within 28 days of accepting any gift or hospitality with an estimated value in excess of £10, provide written notification to the Principal using the 'Declaration of Gifts and Hospitality' form (Appendix B). All offers accepted should be recorded in case of any queries, in particular through FOI requests.

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:

- estimated or actual value;
- an indication from the Principal as to why acceptance of the offer is authorised;
- the employee's/Director/Academy Representative's printed full name and signature; and
- the Principal's printed full name and signature.

5. Monitoring

Each Local Academy maintains a register of gifts and hospitality accepted.

The pro-forma (see Appendix B) detailing the individual declarations should be kept in the Register.

Any concerns/issues identified should be noted and an action plan put in place.

6. Penalties for Breaching the Code

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

7. Monitoring of the Code

As part of its role in promoting high standards of conduct, the Finance and Resources Committee may request to see the register at any time.

8. Retention of Documentation

Documentation in the Register will be kept for seven years.

9. Tax implication

The company recognises the need to raise awareness of any tax implication

| Version | Approval Date | Action/Notes | Signature of the Chair of Committee/Board |
|---------|---------------|--|---|
| 1 | 30/04/14 | Approved by Finance and Resources/Audit and Risk Committee Board Ratified 17/06/14 | Chris Walker: |
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Managing the Receipt of Gifts and Hospitality

The PROVEIT test:

Whether or not the offer is acceptable:

| | |
|-----------------|--|
| Purpose | Token, thanks or seeking a favour? (token or thanks: yes; favour: no) |
| Rules | What are they? Does this situation conform? |
| Openness | Is the offer transparent? |
| Value | Expensive or inexpensive? |
| Ethics | Does the offer fit with Academy ethics? Is this an exceptional circumstance? |
| Identity | Who has made the offer? |
| Timing | Are you about to make a decision affecting the giver? |

Local Academy Name _____

Declaration of Gifts or Hospitality Received

Name: _____

| | |
|--|--|
| Description of gift or hospitality provided | |
| Value/Estimated value of gift or | |
| Date of offer and date of receipt of gift or hospitality | |
| Person / body offering/providing the gift or hospitality: | |
| Person or body receiving the gift or hospitality (other than/as well as you) | |
| Any relationship (including potential future relationship) which you or the Agency has with the person or body offering the gift or hospitality | |
| Why accepting it was in the Academy interests: | |
| For gifts (including items such as tickets and vouchers): do you seek permission to retain/use it yourself, or will you pass/have you passed it to the Principal or other appropriate person to be passed on to charity or deal with it in some other way? | |
| For hospitality or gifts already enjoyed, used or consumed: Why was prior approval not sought? | |

Signed Print Name

Date

Principal..... Print Name

Date

Reason for refusal/approval: _____