



**GIFTS AND HOSPITALITY POLICY FOR
SCHOOLS WITHIN
THE KEYS FEDERATION ACADEMY TRUST**

Company number 09306360

**St. Peter's C. of E. Primary School, Hindley
Hindley Green Community Primary School
St. John's C. of E. Primary School, Hindley Green
St. John's C. of E. Primary School, Abram**



May 2018

Gifts and Hospitality Policy

1. Introduction

- 1.1 As a general guideline, gifts, hospitality or other personal benefits (hereinafter referred to as “Gifts”) should not be accepted or offered by any member of staff, Director or Local Advisory Committee Representative, except as provided for below.
- 1.2 The intention of the Policy is to ensure that the Trust 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 the Trust. The Trust 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.
- 1.3 Any breach of this Policy could lead to disciplinary action and may constitute gross misconduct.

2. The receipt of gifts

- 2.1 The Trust encourages and expects staff, Directors and LAC representatives to use their networks and contacts for its benefit. It is however a fundamental requirement on all staff, Directors and LAC representatives, the contravention of which would be considered to be gross misconduct, that they must not derive any financial benefit beyond their agreed salary 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 the Trust. Therefore staff, Directors and LAC representatives shall not use their authority or office for personal gain beyond their agreed salary and shall seek to uphold and enhance the standing of the Trust by:
- 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, rejecting any business practice that might be deemed improper
 - at all times in their business and other relationships, act to maintain the interests and good reputation of the Trust
- 2.2 Any employee who becomes aware of a breach of Policy must refer to the Trust’s Whistleblowing Policy and report the alleged breach immediately to his or her line manager who will instigate investigations as necessary.
- 2.3 Any personal interest that may impinge, or might reasonably be deemed by others to impinge, on an employee’s, Director’s or LAC representative’s impartiality, or conflict with the duty owed to the Trust in any matter relevant to their duties (such as conflicting business interests) shall be declared in writing. Any member of staff, Director or LAC representative 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.
- 2.4 Staff, Directors and LAC representatives are permitted to accept gifts, rewards or benefits from pupils, pupils’ families, members of the public, or organisations which the Trust has official contacts with, only where they are isolated gifts of a trivial character, or inexpensive seasonal gifts (such as chocolates, flowers, 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.

- 2.5 Where purchased items include a "free gift", such a gift should be either used for Trust business or handed to the Trust to be used at charity raffles, pupil prizes, etc.
- 2.6 In relation to conventional hospitality (lunches, outings, tickets for events, etc), it may be accepted provided that it is normal and reasonable in the circumstances. However, invitations for the following should not be accepted:
- where there is no reasonable business justification for doing so
 - where an invitation is disproportionately generous
 - where the invitation could be seen as an inducement to affect a business or other decision.
- 2.7 Any hospitality, other than of a nominal value (estimate of £50.00) or facilities provided during the normal course of business, should be reported to the CEO, CFO or the Chair of the Trust as appropriate.
- 3. The providing of gifts**
- 3.1 The Trust encourages and seeks cooperative relationships between staff, Directors, LAC representatives, stakeholders and external organisations. Accordingly there can be occasions where it is appropriate for the Trust 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 the academy, particularly after a long period of service. Such gifts are often supplemented with private contributions from continuing members of staff.

This policy was presented to and approved by Directors during the Summer Term 2018.

Signed *B. Anthon* Chair of Directors