



Keskowethyans
Multi Academy Trust

Date Reviewed by the Committee	17.01.16
Date Adopted by The Board	14.03.16
To be reviewed next	
Signed by Chair	

GIFTS & HOSPITALITY POLICY

Date policy sent to	Date
Secretaries	23.03.16
Lead Teachers	23.03.16
GS for Website	23.03.16
Relevant other ie Safeguarding Director/Subject Co-ordinator	

The Keskowethyans Multi Academy Trust is committed to the highest level of integrity, honesty and accountability in all its business dealings. All Directors, staff and Governors are expected to maintain high standards of propriety and professionalism in all their dealings, ensuring they are free from any conflict of interest through their business in the name of the Academy Trust.

Definitions

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.

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.

The Prevention of Fraud and Bribery Act 2010 makes it a criminal offence to:

- Offer, promise or give a bribe
- Request, agree to or accept a bribe
- (by an organisation) fail to prevent bribery by those acting on its behalf ('associated persons') to obtain or retain business or a business advantage for the organisation.

Under this act, a bribe is 'a financial or other advantage' offered, promised or given to induce a person to perform a relevant function or activity improperly, or reward them for doing so.

Statement of Policy

In order to protect all adults involved with the Keskowethyans MAT and the reputation of the schools from accusations of bribery or corruption staff must take extreme care that none of their dealings, directly, or indirectly, could be deemed as a reward or benefit, in line with the Bribery act 2010. This act makes it a criminal offence.

Each Academy within the Trust will hold a Gifts and Hospitality Register.

It is common for appreciative parents and pupils to register their thanks for the work of staff in the form of a small personal gift. If these are valued at less than £30 these are perfectly acceptable without reference to senior members of staff. These will not need to be added to the register.

Where a more valuable gift, benefit or service is offered which is to the good of the school, rather than an individual, then it must be referred to the Executive Headteacher and if in the case of the Executive Headteacher, to the Chair of Directors for approval within their discretion.

Hospitality in the form of working lunches, coffees etc are perfectly acceptable, and it would be appropriate to offer this to support good relationships with visiting staff or business colleagues. These would not be added to the register.

If a member of staff is offered a gift or hospitality whilst involved in the procurement of goods and services, tenders for work or when liaising with anyone conducting business with the school other than light refreshments, it is their responsibility to discuss this with the Executive Headteacher before accepting such benefit. If acceptable, this would need to be added to the register.

If not accepting a gift would be regarded as causing offence, (such as a sudden and unexpected gift, or one where it would cause cultural offence) the item should be accepted. The matter should then be brought to the attention of the Executive Headteacher as soon as possible who may decide to return the gift, discuss it with the Chair of Directors, or/and donate it to a school raffle/ fair or a charitable cause.

Examples of gifts or hospitality that should not be accepted are cash or monetary gifts; gifts or hospitality offers to a member of your family; gifts or hospitality from a potential supplier or tendered in the immediate period before tenders are invited or during the tender process.

Where a gift is received on behalf of the school, the gift remains the property of the school.

All gifts/ hospitality over the value of £30 must be recorded in the Schools Gift and Hospitality Register, whether accepted or not.

Instances of non compliance

In the case where it is believed a member of Staff, Director or Governor has not declared a gift or hospitality then a formal investigation will be instigated by the Executive Headteacher/Chair of Directors. This may take the form of disciplinary procedures in the case of employees if misconduct is indicated.