

King's Group Academies

Policy on the Acceptance of Gifts and Hospitality

Approved: September 2018

To be reviewed: as needed

Introduction

King's Group Academies is committed to the values of probity and accountability. All staff should conduct themselves with integrity, impartiality and honesty at all times. Staff should maintain high standards of propriety and professionalism.

The guiding principles are:

- The conduct of individuals should not create suspicion of any conflict between their official duty and their private interest.
- The action of individuals acting in an official capacity should not give the impression to any member of the public, to any organisation with whom they deal or to their colleagues that they have been (or may have been) influenced by a benefit to show favour or disfavour to any person or organisation.

Application

This policy applies to all Trustees, Governors and members of staff.

Procedures apply to gifts from students and their families as well as from potential suppliers.

Acceptance of Gifts

Staff should not accept gifts or rewards from any organisation or individual with whom they have contact in the course of their work as an inducement either for doing something or not doing something in their official capacity. Particular care should be taken about any gift from a person or organisation which has, or is hoping to have, a contract with the Academy Trust.

Gifts of a trivial or inexpensive nature may be accepted (e.g. diaries, calendars, chocolates), but more substantial or expensive offerings should be declined. The limit is £25 - for gifts over this value a declaration should be made.

Any vouchers received over £50 in value should be used as part of the Trust's expenditure.

Gifts are deemed to include:

- Goods provided for personal or other private use
- Personal services
- Loans of equipment, vehicles etc for personal use
- The provision of goods / services at preferential cost for personal or other private use
- Vouchers

If unsolicited gifts of a substantial nature arrive from contractors they should be returned with polite explanation that the Trust's policies do not allow their acceptance.

Acceptance of Hospitality

Hospitality can take a variety of forms, some of which staff may accept, some of which should be declined.

Staff may be offered hospitality as a normal business practice in a way that is directly linked to their role. Examples of this kind of hospitality include the offer of refreshments at business meetings or the offer of lunch or dinner at the end of an official engagement. This kind of conventional hospitality may be accepted.

Staff may also be offered other forms of hospitality which are not related to their role and are not linked to Trust business. This might include substantial offers of social functions, travel or accommodation, offers of tickets and invitations to sporting, cultural or social events. These forms of hospitality should be declined.

If any member of staff is in doubt about whether it is appropriate to accept any offer of hospitality, the advice of the Finance Director should be sought.

You must never canvass or seek gifts or hospitality.

Declaring the acceptance of a gift

Trustees, Governors and staff must record being offered or accepting any gifts by completing a Declaration of Gifts and Hospitality (Annex A). The declaration should be approved by the Principal /Head for staff in schools, Chair of Governors for Local Governing Boards and Board Chairman for Trustees, Principals/Heads and Executive staff. The Finance Director will maintain the Register for Gifts and Hospitality (Annex B) for declarations over £25 in value and vouchers over £50.

Failure to comply

In all instances where there is a reasonable belief that there has been a failure to declare, the Chair of Governors/ Principal/ Chairman will conduct a formal investigation of the situation. Employees may be subject to disciplinary procedures to pursue potential matters of misconduct.

It is a criminal offence for an employee of the Trust to corruptly accept any inducement or reward for doing, promising or refraining from doing anything in the course of their employment, or corruptly showing favour or disfavour, in the handling of contracts. In acting corruptly the employee would demonstrate their intention to purposefully act with a lack of probity and with a disregard for the implications of their actions for the Trust.

Annex A

Declaration of Gift or Hospitality

<u>Please indicate by ticking box A or B whether you have been offered and declined or have accepted a gift or hospitality</u>

Name:								
Position:								
A	I have been offered a gift / hospitality which I have declined							
]							
В	I have been offered a gift / hospitality which I have accepted.							
	ration details			,				
their relationshin with the			Nature of interest / gift /	Estimated Value				
			hospitality	If applicable				
·								
believe my objectivity and independence in relation to the above external organisation has not been impaired in any way by the offer of gifts or hospitality.								
SIGNE	D (Recipient)		Date					
NAME (capitals)								
SIGNE	D			Date				

Principal/								
Chair of Governors								
NAME (capitals)								
Completed forms should be sent to the Finance Director to enter in Register.								
For office use only								
Entered in Register	Date:							

Declaration of Gifts and Hospitality Register

Date of entry	Name of Trustee, Governor or member of staff	Estimated Value £	Nature of gift / hospitality	Supplier of gift / hospitality	Declaration Form Reference