



**North Cornwall
Learning Trust**

Working Together for Local Children

**NCLT GIFTS AND HOSPITALITY POLICY
(for the Trust and its schools)
February 2019**

Version 1

This document consists of:

- Trust policy on gifts and hospitality
- Template for Gifts and Hospitality Register for completion locally (Annex 1)

1 INTRODUCTION

1.1 The North Cornwall Learning Trust (NCLT) is committed to the highest level of integrity, honesty and accountability in all its business dealings. All staff, trustees, 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 each academy and in the name of the NCLT.

1.2 In order to protect all individuals associated with the Trust, and the reputation of the Trust and its academies from accusations of bribery or corruption, staff, trustees, and governors must take extreme care to ensure that none of their dealings, directly or indirectly, could be deemed as a reward or benefit, in line with the Prevention of Fraud and Bribery Act 2010. This Act 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.

1.3 NCLT and each academy will hold a Gifts and Hospitality Register. All gifts/hospitality over the value of £25 must be recorded in the Gifts and Hospitality Register.

2 DEFINITIONS

2.1 A gift is any item or service, award, prize or any other benefit which is received free of charge; or personally offered at a discounted rate or on terms not available to the general public or which might be seen to compromise the personal judgment or integrity of the recipient.

2.2 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.

3 DEALING WITH GIFTS AND HOSPITALITY

3.1 NCLT expects all staff, trustees, and governors to exercise the utmost discretion in giving and accepting gifts and hospitality when on Trust or academy business. Particular care should be taken about a gift from a person or organisation that has, or is hoping to have, a contract with our organisation. In any instance of doubt, advice must be sought from an academy business manager or the Chief Financial Officer (CFO) of the Trust.

3.2 Staff, trustees and governors must not make use of their official position to further their private interests or those of others.

3.3 Staff, trustees and governors must not accept gifts, hospitality or benefits of any kind from a third party where it might be perceived that their personal integrity is being compromised, or that the Trust/academy might be placed under an obligation.

3.4 Gifts of low intrinsic value such as promotional calendars or diaries, or small tokens of gratitude, may be accepted. If there is any doubt as to whether the acceptance of such an item is appropriate, individuals should decline the gift or refer the matter to the academy business manager or the Trust's CFO.

3.5 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 £25 these are perfectly acceptable without reference to senior members of staff. These will not need to be recorded in the register. Where gifts valued over £25 are accepted, they must be recorded in the register.

3.6 Where a more valuable gift, benefit or service is offered which is to the good of the academy, rather than an individual, it must be referred to the academy business manager and/or the CFO for approval within their discretion; if acceptable, these items must be recorded in the register.

3.7 Hospitality such as working lunches, refreshments etc. are perfectly acceptable where it is appropriate to offer or receive these in support of good relationships with visiting staff or business colleagues. Modest hospitality, provided it is reasonable in the circumstances, should be similar to the scale of hospitality which the Trust as an employer would be likely to offer. These would not be added to the register. Hospitality received above this level should be recorded in the register.

3.8 If a member of staff, trustee or governor 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 CFO immediately.

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

3.10 Examples of gifts or hospitality that must not be accepted include:

- cash or monetary gifts;
- gifts or hospitality offers to a member of your family;
- gifts or gifts or hospitality from a potential supplier or tenderer in the immediate period before tenders are invited or during the tender process; staff, trustee or governor attendance at sporting and cultural events at the invitation of suppliers, potential suppliers or consultants. (Where it is considered that there is a benefit to the Trust, or one of its academies, in a member of staff, trustee or governor attending a sponsored event, the attendance must be formally approved and registered by the CFO).

3.11 Where a gift is received on behalf of the school, the gift remains the property of the school. The gift may be required for departmental display or it may, with the headteacher's approval, remain in the care of the recipient. Unless otherwise agreed, the gift must be returned to the academy or NCLT central office on or before the recipient's last working day.

3.12 Gifts are sometimes offered by suppliers with the purchase of items. All such special offer gifts are the property of the academy and must be used accordingly.

4. GIVING GIFTS AND HOSPITALITY

4.1 NCLT and its academies will not normally give gifts to other individuals or organisations. If gifts are given, staff must ensure that the decision is fully documented in the Gift and Hospitality Register and has regard to the propriety and regularity of the use of public funds. This does not apply to the award of gifts, prizes etc related to the achievement of pupils or students e.g. attainment or merit awards.

4.2 Where hospitality is provided by the Trust or its academies this should be approved in advance by the CFO or a local business manager. In approving hospitality the CFO/business manager must ensure it is not in breach of the UK Bribery Act 2010 and also that the costs are appropriate for a publically funded organisation.

Hospitality such as working lunches, refreshments etc and modest hospitality in the form of light meals etc are perfectly acceptable where it is appropriate to offer or receive these in support of good relationships with visiting staff or business colleagues (but not for their family or friends). These would not be added to the register. Hospitality provided above this level must be recorded in the register.

5. NON COMPLIANCE

5.1 In the case where it is believed a member of staff, a trustee or a governor has not declared a gift or hospitality then a formal investigation will be instigated by NCLT Chief Executive Officer or CFO. If misconduct is indicated, this may take the form of disciplinary procedures

If you would like this in a different format please contact the school

Version and Date		Action/Notes
1.0	February 2019	New policy adopted; Reviewed Michele Bacchus

Policy Reviewed:	February 2019
Next Review:	February 2021
Signature of Chair of Governors:	Signature of Headteacher:
Camelford Primary School	Camelford Primary School
Signature of Chair of Governors:	Signature of Headteacher:

Otterham Primary School	Otterham Primary School
Signature of Chair of Governors:	Signature of Headteacher:
St Breward Primary School	St Breward Primary School
Signature of Chair of Governors:	Signature of Headteacher:
St Teath Primary School	St Teath Primary School
Signature of Chair of Governors:	Signature of Headteacher:
Sir James Smith's School	Sir James Smith's School

ANNEX 1 North Cornwall Learning Trust Trust Gifts and Hospitality Register

School/Academy name:

Recipient	Nature of Gift/Hospitality	Donor	Date	Estimated Value (£)	Comments

NB: Comments should include the reason the gift/hospitality was accepted and the use of the gift, e.g. donated to academy raffle