

# **Gifts and Hospitality Policy**

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## 1.0 Policy statement

Dixons Academies Trust (the Trust) aims to provide the highest standard of service to all of its students and parents and to care for the well being of its employees. In return students, parents and the public are entitled to expect the highest standards of conduct from all of the academy's Trustees, Governors and employees with reference to propriety and regularity in the use of public funds.

## 2.0 Scope and purpose

This policy aims to lay down guidelines which will enable you to meet the aims and core values of the academy and to protect you from misunderstanding or criticism. Inevitably some issues will affect Trustees, Governors and senior post holders more than others and some breaches of the policy may be regarded more seriously for those in such positions.

The principle of integrity requires that Trustees, Governors and staff should not place themselves under an obligation that might influence, or be perceived to influence, the conduct of their duties. This means that the receipt of hospitality and gifts must be subject to clear restrictions.

## 3.0 Gifts

- 3.1 You must not accept any cash gift, or personal gift with a significant monetary value, under any circumstances. Items of nominal value (£25.00 or below) such as a box of chocolates or free promotional pens, calendars and similar items, may be accepted.
- 3.2 Personal gifts may not be solicited under any circumstances. Examples of gifts that should be refused are gifts of free membership or subscriptions, free goods or services that are normally provided at a cost, large gifts from parents.
- 3.3 When you have to decline a gift, you should be courteous but firm, and draw the attention of the person making the offer to the existence of this policy.
- 3.4 All gift offers beyond those outlined in 3.1 must be recorded in the gifts register.
- 3.5 To achieve propriety in the use of public funds, gifts for members of staff who are leaving or have a personal celebration should only be bought with voluntary contributions from colleagues.
- 3.6 Academies may, at the Principal's discretion, use funds responsibly for the purpose of staff wellbeing and recognition, e.g thank you cards for recognition or flowers to recognise a bereavement. The value should be reasonable and not exceed £25. It may be appropriate to consider a charitable donation through voluntary contributions instead. Alcohol must never be purchased under any circumstances.
- 3.7 All gifts to staff or individuals must be recorded on the gifts register.

## 4.0 Hospitality

- 4.1 You should never accept lavish hospitality that could be interpreted as a way of exerting an improper influence over the way you carry out your duties. Nor should you offer such hospitality to others on behalf of the academy. The timing of hospitality in relation to procurement or purchasing decisions that the academy may be taking is especially sensitive. Above all, you must never solicit hospitality. As a general rule, you should not accept hospitality that the Academy would not reciprocate in similar circumstances.
- 4.2 When you have to decline hospitality, you should be courteous but firm, and draw the attention of the person making the offer to the existence of this policy. If necessary, you should pay your share of any costs, and claim these in the ordinary way.

## 5.0 Acceptable hospitality

- 5.1 You may accept modest working meals and light refreshments without making any declaration.
- 5.2 Other hospitality may be accepted, for instance where:
  - there is a genuine need to impart information or represent the academy in the community
  - an event is clearly part of the life of the community or where the academy should be seen to be represented
  - the hospitality concerns attendance at a relevant conference or course where it is clear the hospitality is corporate rather than personal
- 5.3 Before accepting any hospitality, approval should be sought from the Chair in respect of Governors or the Principal in respect of employees. In exceptional circumstances retrospective approval may be obtained. All hospitality received must be recorded in the academy's hospitality register with the exception of working meals, receptions for visiting staff or business colleagues etc.
- 5.4 It may be appropriate for the Trust or an academy to provide a celebratory meal or business event in keeping with the ethos of the Trust to celebrate achievements and/or hard work. In approving such events, the Chief Executive Officer will give due consideration to both rules on personal taxation from HMRC and the requirement to properly utilise public funds. For example, staff events should be available to all staff in a location and in aggregate should not breach the HMRC regulations of £150 per person per annum. Event budgets should not exceed £50 per head. These do not need to be added to the register but will be monitored by the Chief Operations and Finance Officer/Principal to ensure they are at a reasonable level.
- 5.5 Any hospitality provided should not be extravagant or excessive in nature.



## **6.0 Sponsorship**

Where an outside organisation wishes to sponsor or is seeking to sponsor the activity of the academy, whether by invitation, tender or negotiation, or voluntarily, the basic conventions concerning the award of contracts, and acceptance of gifts or hospitality apply.

## **7.0 Gifts and hospitality register**

Academies must keep a register of gifts and hospitality which is submitted to the Head of Finance annually for monitoring compliance and regularity. The Head of Executive Services will maintain a register for central staff including executive staff and trustees. It will be the responsibility of individuals to notify the registrar of all gifts and hospitality given or received in line with this policy. Employees should also register gifts and hospitality offered but declined as a matter of good practice.

## **8.0 Expense claims**

- 8.1 Claims for reimbursement of expenses should be made on the relevant Expense Claim Form and submitted once authorised by the budget holder. Receipts should always be enclosed. The principles of this policy apply in the same way.
- 8.2 Alternatively authorised invoices from the suppliers can be paid in accordance with the normal procedures.

