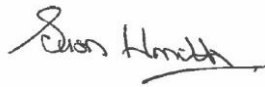


Gifts and Hospitality Guidance

Approved by the Board of Trustees on 28th-March 2022

Signature of Chair:



Review date: March 2025

Any gifts, rewards and benefits that are disproportionately generous or that could be seen as an inducement to affect a business decision should be declared and/or declined. The acceptance of gifts and hospitality is a sensitive area where actions can easily be misconstrued. Unlike private industry, the actions of public sector employees are open to public scrutiny. Therefore, the actions of employees, Trustees, Members and local Governors should be such that they would not be embarrassed to explain them to anyone.

These guidelines will help colleagues to judge what sort of gift, and what level of hospitality is acceptable.

The following general rules apply and must guide decisions on receipt of gifts and hospitality as an employee/associate of the Trust:

- To accept gifts should be the exception. Acceptance of small 'thank you' gifts of token value, such as a diary, a coffee mug or bunch of flowers, not over £25 in value is permissible. The Financial Coordinator should be notified of any gift or hospitality over this value for entry in the Register of Business Interests (Appendix 1)
- Always say 'no' if you think the giver has an ulterior motive. Be sensitive to the possibility that the giver may think that even small gifts or simple hospitality will elicit a more prompt service or preferential treatment.
- Never accept a gift or hospitality from anyone who is, or may be in the foreseeable future, tendering for any contract with the Trust, seeking employment with the Trust or is in dispute with the Trust, even if you are not directly involved in that service area.
- Where items purchased for the Trust include a 'free gift', such a gift should either be used for Trust business or handed to the Financial Coordinator to be used for charity purposes.

- Staff have a responsibility to consult their Head teacher regarding any doubts about the acceptability of any gift or offer of hospitality.
- Trustees should consult the Chair of the Trust regarding any doubts about the acceptability of any gift or offer of hospitality.
- A gauge of what is acceptable in terms of hospitality is whether the Trust would offer a similar level of hospitality in similar circumstances.
- The Chief Finance Officer will ensure, alongside the relevant senior leader, that decisions on whether individuals or the Trust can accept, or offer, gifts or hospitality with a value of over £25 are in line with this policy.
- Entries in the Gifts and Hospitality register will be reported to the Finance Audit and Risk Committee.
- Occasional working lunches with customers, providers or partners are generally acceptable as a way of doing business provided they are not to an unreasonable level or cost.
- Invitations to corporate hospitality events must each be judged on their merit. Provided the general rules have been taken into account, it may be acceptable to join other company/organisation guests at:
 - a. sponsored cultural and sporting events, or other public performances, as a representative of the Trust;
 - b. special events or celebrations.

the number of these events and likely public perception should always be taken into consideration.

- Acceptability depends on the appropriateness of the invitations, in terms of the level of hospitality, the frequency and the status of the invited employee. In all such cases the Head teacher or Chief Executive Officer must be consulted.
- Paid holidays or concessionary travel rates are not acceptable. Neither are offers of hotel accommodation nor the use of company villas/ apartments.
- If a member of staff is visiting a company to view equipment that the Trust is considering buying, they should ensure that expenses of the trip are paid by the Trust. Acceptance of refreshments and/or a working lunch may be acceptable, but care must be taken to ensure that the Trust's purchasing and/or tender procedures are not compromised.
- Acceptance of sponsored hospitality that is built into the official programme of conferences and seminars related to work are acceptable.

- Offers to speak at corporate dinners and social gatherings, or events organised by, for example, a professional body, where there is a genuine need to impart information or represent the Trust must be agreed in advance with the Chief Executive Officer. Where a spouse or partner is included in the invitation, and approval has been given for you to attend, it will be acceptable for your spouse or partner to attend as well, but if expenses are incurred, these will be met personally.
- Any invitation you accept should be made to you in your professional/working capacity as a representative of the Trust.

Presenting Gifts

The purchase and presentation of gifts on behalf of the Trust and/or schools within the Trust are also open to public scrutiny. There are few occasions on which it can be justified that public money can appropriately be used to purchase gifts or make donations. However, there are occasions where a gift can be justified, e.g. for exceptional/long service, to thank a volunteer for working with pupils or when a staff member is affected by severe ill health or bereavement.

In these circumstances, the purchase of small 'thank you' type gifts of token value, such as a diary, a coffee mug or bunch of flowers, not over £50 in value is permissible. (Alcohol is not permissible.) The Financial Co-ordinator should be notified of any gift or hospitality such that it can be recorded. Never offer a gift or hospitality from anyone who is, or may be in the foreseeable future, tendering for any contract with the Trust, seeking employment with the Trust or is in dispute with the Trust, even if you are not directly involved in that service area.

The De Curci Trust, a charitable company limited by guarantee registered in England and Wales with company number 10646541. Registered office address: Springfield School Central Road, Drayton, Portsmouth, Hampshire, United Kingdom, PO6 1QY.