



**THIS POLICY COVERS ALL ACADEMIES/SCHOOLS WITHIN
ARDEN MULTI-ACADEMY TRUST**

Name of Policy	Gifts and Hospitality Policy	
Lead	Martin Murphy, CEO	
Governor Committee	Audit & Risk Committee	
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	Trustee Approved	12 th December 2023
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	MPM reviewed on 10 th June 2019	



General

This is Arden Multi-Academy Trust's (AMAT/the Trust) approved Code of Conduct relating to the offer and/or acceptance by staff of gifts and hospitality of whatever nature from outside individuals or organisations.

Within the terms of the code, staff and governors/trustees are expected to exercise common sense. If they are in any doubt they must consult the CEO/Associate Headteacher and in every case declare the acceptance of a gift or hospitality in the register kept by the Trust, using the AMAT's 'Declaration of Gifts and Hospitality' form.

The process set out is designed to safeguard governors and staff from any misunderstanding or criticism.

The general principles which govern gifts and hospitality are:

- Offers of hospitality should only be accepted if there is a genuine need to represent the Trust.
- Gifts should only be accepted in exceptional circumstances.
- The Code of Conduct applies to all trustees, governors and staff of the Trust.
- To determine whether a gift or hospitality is acceptable, the 'PROVEIT' test (Appendix A) should be applied by staff and referred to the CEO/Associate Headteacher if in doubt. For further clarification, see the 'Quick Test', Appendix D.
- Registers are accessible for viewing by the following appropriate officers: CEO/Associate Headteacher, trustees, governors, Director of Finance, external auditors and Responsible Officer.
- Any request by a member of the public to view the Register of Declarations of Gifts and Hospitality will be referred to the CEO. In considering any request, the requirement for the Trust to be open and transparent will be balanced against the requirements of General Data Protection Regulation 2018

Hospitality

The following principles should be followed in deciding whether or not to accept hospitality:

- (i) Trustees, staff and governors should ask themselves whether members of the public, knowing the facts of the situation, could reasonably think that they might be influenced by the hospitality offered. If the answer is yes, the hospitality should be declined. In making judgements, relevant facts to take into account include the person or organisation offering the hospitality, its scale and nature, and its timing in relation to decisions to be made to the school/academy.

- (ii) Care should be taken to avoid situations in which an individual governor or member of staff is the sole person invited to partake of hospitality or where it creates a pattern of receiving hospitality from that organisation
- (iii) Examples of when it may be proper to accept hospitality (always depending upon the particular circumstances) are as follows:
 - a. Attendance at conferences, events and demonstrations of equipment organised by outside bodies where there is a service interest
 - b. Attendance at events or functions where there is a demonstrable need for the Academy to be represented to either give or to receive information or to participate as part of the Trust's corporate image
 - c. Attendance at events or functions which are part of the civic, cultural or sporting life of the AMAT
 - d. Working lunches where this is an appropriate and effective way of conducting business and the refreshments provided are on a reasonable level
 Overnight hospitality linked to any of the above should not be accepted.

Gifts

All personal gifts should be refused or donated to charity unless they come within the categories set out in below:

- (i) Modest gifts of a promotional character, e.g., calendars, diaries, etc., may be accepted.
- (ii) Gifts on the conclusion of any courtesy visit to an outside organisation, of a sort normally given by that organisation, may be accepted.
- (iii) Gifts which are intended for the Trust as a corporate body or intended for AMAT can be accepted but must not be retained by the individual who receives them. Such gifts should be passed to the Trust as appropriate.

Registration of gifts and hospitality

Staff must, within 28 days of accepting any gift or hospitality with an estimated value in excess of £25, provide notification to the CEO/Associate Headteacher using the 'Declaration and Hospitality' form (Appendix B). All offers accepted should be recorded in case of any queries, in particular through FOI requests.

The Declaration of Gifts and Hospitality forms must be completed in full, setting out full details of the offer or the gift and or hospitality received as well as:

- Estimated or actual value;
- An indication from the CEO/Associate Headteacher as to why acceptance of the offer is authorised;
- The employee/governor's printed full name (not typed) and signature;
- The CEO/Associate Headteacher's printed full name (not typed) and signature.

Monitoring

The Trust maintains a register of gifts and hospitality accepted.

If there are no declarations of gift/hospitality in an academic year, a nil return should be made in the register. The pro-forma (see Appendix B) detailing the individual declarations should be kept in the register. Copies of these forms should be attached to the annual declaration that confirms that the register is up to date.

The Trust monitors the register annually and reports the outcome to the Audit & Risk Committee. Any concerns/issues identified should be noted and an action plan put in place.

Penalties for breaching the code

The Trust's disciplinary procedure may be applied where it is found that breaches of the code have occurred.

Monitoring the code

As part of its role in promoted high standards of conduct, the Audit & Risk Committee will receive annual reports on the monitoring of the code.

Retention of documentation

Documentation in the register will be kept for seven years.

Declaration of interests

Employees should declare certain interests via the form in Appendix C as follows:

- Interests in contracts (including the interest of a spouse or partner)
- Relationships with contractors and potential contractors
- Non-financial interests which you consider could conflict with the school/academy's interests
- Financial interests which could conflict with the Trust's interests

Hospitality can be accepted under circumstances set out in the code, but must be authorised and recorded.

You should protect yourself from allegations of favouritism by declaring any relationships in relation to contractors, suppliers or elected members. This should be done at the earliest opportunity. For relationships with contractors, suppliers this could be as part of the tendering process or at the earliest time when it becomes apparent that a conflict will arise.

Employees dealing with contracts should make an annual declaration of interests, including nil returns if you have no interests to declare.

Personal purchases

You should be aware of possible conflicts of interest when purchasing goods or using the services of firms which have contracts with the Trust. You should neither seek, because of your position, nor accept, because of an organisation's dealings with the Trust, preferential rates, reductions or any other favourable treatment in the purchase of goods and services. This does not apply to generally available schemes or discount schemes arranged by the Trust for all staff.

Appendix A

Managing the Receipt of Gifts and Hospitality

The 'PROVEIT' test:

Whether or not the offer is acceptable...

Purpose	Is it a token, a thank you or are they seeking a favour? (token or thanks: YES; favour: NO)
Rules	What are they? Does this situation conform?
Openness	Is the offer transparent?
Value	Expensive or inexpensive?
Ethics	Does the offer fit with Trust ethos? Is this an exceptional circumstance?
Identity	Who has made the offer?
Timing	Are you about to make a decision affecting the giver?

Appendix B

Declaration of Gifts or Hospitality Received

Name: _____

Description of the gift or hospitality being offered	
Value/estimated value of the gift or hospitality	
Date of offer and date of receipt of gift or hospitality	
Person/organisation offering the gift or hospitality	
Any relationship (including potential future relationships) which you or the Trust has with the person or body offering the gift or hospitality	
Why accepting it was in the Trust's interest	
For gifts (including items such as tickets and vouchers): do you seek permission to retain/use it yourself, or will you pass/have you passed it to the Associate Headteacher or other appropriate person to be passed on to charity or deal with in some other way?	
For hospitality or gifts already enjoyed, used or consumed: why was prior approval not sought?	

Signed: _____ Date: ____/____/____

CEO/Associate Headteacher:

_____ Date: ____/____/____

Reason for refusal/approval:

Appendix C

Hospitality/Declaration of Interests Form

The interests of any person from whom you have received a gift or hospitality with an estimated value of at least £25.

Declaration of interest or interest of person from whom gift/hospitality Received	Nature of gift/hospitality	Date received

Authorised by line manager

Name:	
Signature:	
Date:	

Appendix D

Doing the Right Thing – ‘Quick Test’

Policies and guidance cannot cover every circumstance. Therefore, a ‘quick test’ is provided to help you make decisions about appropriate business conduct. If your contemplated action makes good business sense, and you can answer yes to the following ‘quick test’ questions, you can feel comfortable in proceeding.

- Is the action legal?
- Is it right and honest and does not deceive or mislead?
- Is the action within the terms or the spirit of these standards, our policies and our brand?
- Does it avoid creating a sense of obligation?
- Can I justify this to my manager?
- If I belong to a professional body, does it comply with its codes?
- Would I feel comfortable reading about it in the press?