




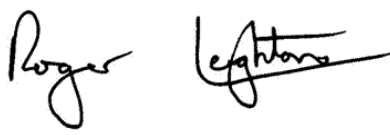
Partnership Learning

Gifts and Hospitality Policy

MONITORING, EVALUATION AND REVIEW

The Board of Trustees and Local Governing Boards will assess the implementation and effectiveness of this policy. The policy will be promoted and implemented throughout the Trust and its schools.

This Policy will be reviewed by the Board of Trustees annually and must be signed by the Chair of the Board of Trustees and Chief Executive.

Policy Adopted/Approved by Board of Trustees:	20th November 2023
Next Review:	Annually
Signature of Chair of the Board of Trustees:	Signature of Chief Executive:
	

Introduction

Partnership Learning is committed to raising awareness amongst Members, Trustees, Governors and staff of their responsibility to act in good faith by not accepting or commissioning an advantage of any kind from those organisations who do business with the Trust or its academies. The giving or receiving of gifts and excessive hospitality can not only damage the Trust's reputation, but would also be in breach of the Academy Trust Handbook which sets out the framework within which Academies must operate. This document sets out the Trust's policy with regard to the acceptance of gifts and/or hospitality and also where the giving of gifts and/or provision of hospitality may be appropriate.

1.0 RECEIPT/GIVING OF GIFTS/HOSPITALITY FROM/TO INDIVIDUALS/ORGANISATIONS EXTERNAL TO THE TRUST

1.1 Receipt of Gifts and/or Hospitality from external individuals or organisations

As a general guideline, business gifts and hospitality should not be accepted from external individuals or organisations by any Member, Trustee, Local Governor or member of staff, except as provided for below.

The intention of the policy is to ensure that the Trust can demonstrate that no undue influence has been applied or could be said to have been applied by any supplier or anyone else dealing with the Trust or its Academies. The Trust should be able to show that all decisions are reached on the basis of value for money and for no other reason. Any consideration of whether or not the principles of this Policy have been breached will be determined by reference to this provision.

Any breach of this Policy could lead to disciplinary action.

Members, Trustees, Local Governors or Employees shall not use their authority or office for personal gain and shall seek to uphold and enhance the standing of the Trust by:

- i. Maintaining an unimpeachable standard of honesty and integrity in all their business relationships.
- ii. Complying with the letter and spirit of the law, and contractual obligations, rejecting any business practice that might be deemed improper.
- iii. At all times in their business relationships acting to maintain the interests and good reputation of the Trust.
- iv. Reporting any breach of this policy which they become aware of immediately to their line manager if an employee, the Chair of Governors if a Governor or the Chair of Trustees if a Trustee or Member.

- v. Declaring in writing, as an entry in the Register of Business Interests, any personal interest (such as conflicting business or family interests) that may impinge or might reasonably be deemed by others to impinge on their impartiality or conflict with the duty owed to the Trust in any matter relevant to their duties

Members, Trustees, Local Governors or Employees are permitted to accept gifts, rewards or benefits from external individuals or organisations only where they are isolated gifts of a trivial character (such as diaries or calendars). Gifts should not therefore be accepted if they appear to be disproportionately generous or could be construed as an inducement to affect a business decision.

Where purchased items include a “free gift”, such gifts become the property of the Trust rather than any individual and should either be used for Trust business or used by the Trust at charity raffles etc.

In relation to conventional hospitality offered by external individuals or organisations (lunches, outings, tickets for events etc.) - provided that it is normal and reasonable in the circumstances they may be accepted. Such invitations should not be accepted where there is no reasonable business justification for doing so, where an invitation is disproportionately generous, or where the invitation could be seen as an inducement to affect a business decision.

Any offers of gifts or hospitality which an individual believes may breach the acceptable limits outlined above should be approved in advance before acceptance, by submitting a Gifts and Hospitality Approval Form to the relevant approver (Appendix 1).*

1.2 Giving of Gifts & Hospitality to external individuals or organisations

Partnership Learning will not normally give gifts to external individuals or organisations. This does not apply to charitable donations made as a result of fund raising.

Conventional hospitality to external individuals or organisations, such as lunches/dinners, teas and coffees, etc is acceptable where provided in a business context and it is appropriate to offer or receive these in support of good working relationships and/or in recognition of the timing of an associated meeting.

Any hospitality or gifts to be offered to external individuals or organisations outside the parameters outlined above, whether to be offered by a school or the central Trust, should be approved by the to the relevant approver in advance, by submitting a Gifts and Hospitality Approval Form (Appendix 1).*

Funds under the control of the Trust or its schools should not be used for the purchase of alcohol, either as part of the provision of hospitality or as gifts.

2.0 RECEIPT/GIVING OF GIFTS/HOSPITALITY INTERNALLY WITHIN THE TRUST

2.1 Receipt of Gifts and/or Hospitality from the Trust as an organisation or individuals acting in a Trust role

As a general guideline, gifts and hospitality from the Trust as an organisation or individuals acting in a Trust role should not be accepted by any Member, Trustee, Local Governor or member of staff, except as provided for below.

The intention of the policy is to ensure that the Trust can demonstrate that no undue influence has been applied or could be said to have been applied by any individual acting in a Trust role. The Trust should be able to show that all decisions are reached on the basis of value for money and for no other reason. Any consideration of whether or not the principles of this Policy have been breached will be determined by reference to this provision.

Any breach of this Policy could lead to disciplinary action.

Members, Trustees, Local Governors or Employees shall not use their authority or office to obtain undue influence and shall seek to uphold and enhance the standing of the Trust by:

1. Maintaining an unimpeachable standard of honesty and integrity in all their internal professional relationships.
2. Complying with the letter and spirit of the law, and contractual obligations, rejecting any professional practice that might be deemed improper.
3. At all times in their internal professional relationships acting to maintain the interests and good reputation of the Trust.
4. Reporting any breach of this policy which they become aware of immediately to their line manager if an employee, the Chair of Governors if a Governor or the Chair of Trustees if a Trustee or Member.
5. Declaring in writing, as an entry into the Register of Business Interests, any personal interest (such as conflicting business or family interests) that may impinge or might reasonably be deemed by others to impinge on their impartiality or conflict with the duty owed to the Trust in any matter relevant to their duties

Members, Trustees, Local Governors or Employees are permitted to accept gifts, rewards or benefits from the Trust as an organisation or individuals acting in a Trust role only where they are isolated gifts of a trivial character (such as flowers or chocolates). Gifts should not therefore be accepted if they appear to be disproportionately generous or could be construed as an inducement to affect a professional decision.

In relation to conventional hospitality offered by the Trust as an organisation or individuals acting in a Trust role - provided that it is normal and reasonable in the circumstances they may be accepted. Such hospitality should not be accepted where there is no reasonable professional justification for doing so, where hospitality is disproportionately generous, or where the hospitality could be seen as an inducement to affect a professional decision.

Any offers of gifts or hospitality which an individual believes may breach the acceptable limits outlined above should be approved in advance before acceptance, by submitting a Gifts and Hospitality Approval Form to the relevant approver (Appendix 1).*

2.2 Giving of Gifts & Hospitality to individuals acting in a Trust role

Partnership Learning will not normally give gifts to individuals acting in a Trust role (Members, Trustees, Local Governors or Employees).

Conventional hospitality to individuals acting in a Trust role, such as lunches/dinners, teas and coffees, etc is acceptable where provided in a professional context and it is appropriate to offer or receive these in support of good working relationships and/or in recognition of the timing of an associated meeting. Isolated gifts of a trivial character (such as flowers or chocolates) are acceptable, in support of staff well-being, morale and motivation.

Any hospitality or gifts to be offered to individuals acting in a Trust role outside the parameters outlined above, whether to be offered by or on behalf of a school or the central Trust, should be approved by the relevant approver in advance, by submitting a Gifts and Hospitality Approval Form (Appendix 1).*

Funds under the control of the Trust or its schools should not be used for the purchase of alcohol, either as part of the provision of hospitality or as gifts.

3.0 REGISTER OF GIFTS & HOSPITALITY

3.1 Recording of Gifts and/or Hospitality Received or Given

Any Member, Trustee, Governor or Employee should record in the Register of Gifts & Hospitality, within 28 days of the gift and/or hospitality being received or given, any Gifts and/or Hospitality received or given from/to any external individuals or organisations, or from/to any individual acting in a Trust role, in the following circumstances:

Gifts and/or Hospitality Received:

- Receipt or offer of any gift or hospitality with an estimated value of over £30, whether accepted or rejected

Gifts and/or Hospitality Given:

- Any gift given
- Any hospitality given with a value of over £18 per person

Recording in the Register of Gifts & Hospitality should be carried out by completing a Declaration of Gifts and Hospitality form (Appendix 2) and submitting this to:

- the School Finance Lead (usually the School Business Manager/Leader or equivalent) for school-based employees or Governors or
- the Trust Director of Finance for Central Trust employees, Trustees or Members.

These forms will then be reviewed and the relevant information included within the Gift & Hospitality Register for the academy or Trust.

** Note: In respect of items needing prior approval, the following apply:*

- 1. If the individual requesting prior approval is an employee or Governor he/she must submit their request to the CEO.*
- 2. If the individual requesting prior approval is the CEO he/she must submit their request to the Chair of Trustees.*
- 3. If the individual requesting prior approval is a Trustee he/she must submit their request to the Chair of Trustees.*
- 4. If the individual requesting prior approval is the Chair of Trustees he/she must submit their request to the Members collectively.*
- 5. If the individual requesting prior approval is a Member he/she must submit their request to the Chair of Trustees.*

APPENDIX 1

Gifts and Hospitality Approval Form

Full Name			
Role		Tick	
	Employee – School Based		Name of School:
			Job Title:
	Employee – Central Trust		Job Title:
	Governor		Name of School:
	Trustee		
	Member		

I have been offered gifts or hospitality which I believe may breach the acceptable limits outlined in the Trust Gifts and Hospitality Policy and therefore require approval in advance before acceptance.

I wish to offer hospitality or gifts outside the parameters outlined in the Trust Gifts and Hospitality Policy, and therefore require approval in advance.

Name of Organisation/Person	Nature of Gift/Hospitality	Estimated Value (If Applicable)

Reason for approval request:

Signed:	Date:
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Approved By:	Date:
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Please submit this form as follows:

- 1. If you are an employee or Governor you must submit your request to the Trust CEO.*
- 2. If you are the Trust CEO you should submit your request to the Chair of Trustees.*
- 3. If you are a Trustee you must submit your request to the Chair of Trustees.*
- 4. If you are the Chair of Trustees you must submit your request to the Members collectively.*
- 5. If you are a Member you must submit your request to the Chair of Trustees.*

APPENDIX 2

Declaration of Gifts and Hospitality Form

Full Name			
Role		Tick	
	Employee – School Based		Name of School:
			Job Title:
	Employee – Central Trust		Job Title:
	Governor		Name of School:
	Trustee		
	Member		

I have been offered a gift/hospitality with an estimated value of over £30, which I have declined

I have been offered a gift/hospitality with an estimated value of over £30, which I have accepted

I have given a gift (of any value) OR hospitality with a value of over £18 per person

Date of offer:

Name of Organisation/Person	Nature of Interest/Gift/Hospitality	Estimated Value (If Applicable)

Reason (in line with Trust policy) for accepting/declining gift or hospitality:
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Signed:	Date:
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Approved By:	Date:
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Completed forms should be submitted to:

- If you are a school-based employee or Governor please submit your completed form to your school's the School Finance Lead (usually the School Business Manager/Leader or equivalent)
- If you are a Central Trust employee, Trustee or Member, please submit your completed form to the Trust Director of Finance.