



# ASPIRE ACADEMY

## GIFTS AND HOSPITALITY

### POLICY AND PROCEDURES

POLICY FIRST ADOPTED AND RATIFIED BY THE TRUST	June 2016
POLICY TO BE REVIEWED ANNUALLY OR AS REQUIRED	

**Signature:** *Vic Goddard*

**Date:** 29/06/16

**Name:** Vic Goddard

**CHAIR OF GOVERNORS**

## **1. Introduction**

- 1.1** The intention of the Policy is to ensure that Aspire Academy can demonstrate that no undue or improper influence has been applied, or could be perceived to have been applied, by any supplier or anyone else dealing with the Academy. The Academy must be able to show that all decisions made have due regard to propriety and regularity, whether educational, financial or otherwise. It must also evidence that decisions are reached on the basis of the proper application of laid-down procedures and for no other reason.
- 1.2** As a general guideline, gifts, hospitality or other personal benefits (hereinafter referred to as “Gifts”) should not be accepted or offered by any member of staff or Trustee, except as provided for below.
- 1.3** Any breach of this Policy could lead to disciplinary action and may constitute gross misconduct.

## **2. The receipt of gifts**

- 2.1** The Academy encourages and expects staff and trustees to use their networks and contacts for its benefit. It is however a fundamental requirement on all staff and trustees, that they must not derive any financial benefits, beyond their agreed salary, from decisions they make or contribute to. Financial gain from decisions involving the education of pupils or the spending of significant sums from the Academy’s budget would be considered to be gross misconduct. Therefore staff and trustees shall not use their authority or office for personal gain and will demonstrate that all financial decisions have due regard to propriety and regularity. This will be evidenced by ensuring that staff and trustees of the Academy:
  - i.** maintain an unimpeachable standard of honesty and integrity in all their business and other relationships.
  - ii.** comply with the letter and spirit of the law in contractual obligations, rejecting any business practice that might be deemed improper.
  - iii.** at all times in their business and other relationships, act to maintain the interests and good reputation of the Academy.
- 2.2** Any employee who becomes aware of a breach of Policy must refer to the Academy’s Code of Conduct Policy and report the alleged breach immediately to his or her line manager who will instigate investigations as necessary.
- 2.3** For transparency, any personal interest that may impact, or be seen to impact, on an employee's or trustee’s impartiality, or conflict with the duty owed to the Academy in any matter relevant to an employee's or trustee’s duties shall be declared in writing. Any member of staff or trustee who is aware of any business dealings which could result in financial and/or personal gain for themselves, their relatives or associates must make an appropriate entry in the Register of Business Interests, this includes information on:

- i. Businesses of which they are partner or sole proprietor.
- ii. Company directorships including conflicting business interests.
- iii. Charity trusteeships.
- iv. Membership of professional bodies, membership organisations, public bodies or special interest groups where they have a position of general control or management.
- v. Details of all gifts or hospitality offered by external bodies whilst acting as a member of staff or a Trustee and whether this was declined or accepted in the last 12 months.
- vi. Contracts offered by Staff or trustees for the supply of goods and / or services to the trust/academy.
- vii. Company directorships or trusteeships of family members.

**2.4** Staff and trustees are permitted to accept gifts, rewards or benefits from students, students' families, members of the public, or organisations which the Academy has official contacts with, only where they are isolated gifts of a trivial character, or inexpensive seasonal gifts (such as chocolates, flowers, diaries or calendars). Therefore, gifts should not be accepted if they appear to be disproportionately generous, or could be viewed as an inducement to influence a decision or action, whether business, educational, or other.

**2.5** Where purchased items include a "free gift", such a gift should either be used for Academy business or handed to the Academy to be used at charity raffles, pupil prizes, etc.

**2.6** In relation to conventional hospitality (lunches, outings, tickets for events, etc), it may be accepted provided that it is normal and reasonable in the circumstances. However, invitations for the following should not be accepted where:

- i. there is no reasonable business justification for doing so.
- ii. an invitation is disproportionately generous.
- iii. the invitation could be seen as an inducement to influence a business or other decision.

**2.7** Any hospitality, other than of a nominal value (estimate of £50.00) or facilities provided during the normal course of business, should be reported to the Principal, Chair of the Trust or Chair of the Finance and Premises Committee as appropriate.

### **3 The providing of gifts**

The Academy encourages and seeks cooperative relationships between staff, trustees, stakeholders and external organisations. Accordingly there can be occasions where it is appropriate for the Academy to provide and fund limited gifts, in particular hospitality, which will principally be dealt with in-house. Likewise it may be appropriate for leaving gifts to be provided to staff leaving the employment of the Academy, particularly after a long period of service. Other such occasions include long term get-well gifts or thank you gifts for work completed over and above expectation. Such gifts are often supplemented with private contributions from continuing members of staff.