



Gifts and Hospitality Policy Version 2.2

<p>Important: This document can only be considered valid when viewed on the TEAL website. If this document has been printed or saved to another location, you must check that the version number on your copy matches that of the document online.</p> <p>Name and Title of Author:</p>	<p>Jennifer Jewitt, Chief Financial Officer (CFO) and Lisa Longstaff, Director of HR and Governance</p>
<p>Name of Responsible Committee/Individual:</p>	<p>Resources and Finance Committee</p>
<p>Implementation Date:</p>	<p>November 2023</p>
<p>Review Date:</p>	<p>November 2026</p>
<p>Target Audience:</p>	<p>Anyone working for or with the Education Alliance</p>
<p>Related Documents: All TEAL policies and procedures referred to are located on the TEAL website, www.theeducationalliance.org.uk.</p> <p>If English is not your first language, and you require assistance/translation, please contact the HR Department.</p> <p>This policy has been equality impact assessed, as detailed in section 3.</p>	<p>UK Bribery Act 2010 Ministry of Justice Guidance Expectations and Code of Conduct Declarations and Conflict of Interest Policy Whistleblowing Policy Governance Framework Disciplinary Policy Ethical Leadership Framework Academy Trust Handbook</p>

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POLICY STATEMENT

We are here to make great schools and happier, stronger communities so that people have better lives. We do this by:

- Always doing what is right
- Trusting in each other and standing shoulder to shoulder
- Doing what we know makes the difference

Doing what is right means always acting with integrity, in the interests of others and being honest, open and transparent.

The principle of integrity requires that Members, Trustees, Governors, other volunteers and staff should not place themselves under any 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 and that any that are accepted must be declared and recorded.

The process set out in this policy and procedure is designed to safeguard Members, Trustees, Governors, other volunteers and staff from any misunderstanding or criticism.

This policy takes into consideration the requirements under the UK Bribery Act 2010, and the Ministry of Justice guidance.

1. SCOPE

This policy applies to all those employed by or working with the Education Alliance (TEAL); therefore declarations may be made by employees, agency workers, Members, Trustees, Governors, contractors, trainees and visitors.

2. ROLES AND RESPONSIBILITIES

The Resources and Finance Committee is responsible for approving this policy and the **Executive Team** and **Audit and Risk Committee** is responsible for monitoring the effectiveness of this policy.

The **CEO** is responsible for ensuring that staff and others adhere to this policy and that declarations are appropriately assessed, and any associated risks are mitigated accordingly.

The **HR Department** is responsible for ensuring that all staff and workers are aware of this policy and procedure. The Central Administrative Team will ensure that all Members, Trustees and Governors are aware of and adhere to this policy.

Managers and staff with supervisory, leadership, financial or procurement responsibilities must ensure they declare any conflicts of interest and encourage their teams and any third parties they are working with to adhere to this policy.

All those named in the scope of this policy must adhere to this policy. If individuals are unsure, they should err on the side of caution and seek advice prior to accepting gifts or hospitality.

People working with or for TEAL can use the Whistleblowing Policy, should they wish to report a breach of this policy.

3. EQUALITY AND DIVERSITY

TEAL is committed to:

- Promoting equality and diversity in its policies, procedures and guidelines
- Delivering high quality teaching and services that meet the diverse needs of its pupil population and its workforce, ensuring that no individual or group is disadvantaged

Equality impact assessments enable TEAL to consider any direct or indirect impact a policy, procedure, guide or change might have on people with protected characteristics. Evidence gathering can assist with monitoring and evaluation processes (e.g. trend analysis) to assist TEAL in understanding if an unintended impact has occurred. Equality impact assessments support evidence-based decisions, transparency and consideration of equality issues. This policy has been equality impact assessed and there are no equality and diversity risks associated with this policy, in respect of any of the protected characteristics.

TEAL will collate equality related data to share with trade union colleagues via TEAL's trade union forum, the Executive Team and the Resources and Finance Committee, ensuring TEAL is able to monitor whether certain categories of staff, particularly staff with protected characteristics, are accessing this policy/submitting declarations more frequently than other staff.

4. AIMS

This policy aims to ensure that:

- TEAL funds are used only in accordance with the law, its Articles, its funding agreement and the latest Academy Trust Handbook.
- TEAL and those associated with it operate in a way that aligns with the Nolan principles of public life, ensuring we serve our communities effectively and appropriately.
- TEAL has due regard to propriety and regularity, and ensures value for money, in the use of public funds.
- Trustees fulfil their fiduciary duties and wider responsibilities as charitable trustees and company directors.
- People working for and with TEAL are aware of what constitutes acceptable gifts and hospitality, and the process that must be followed if they are presented with gifts and/or hospitality.

5. DEFINITIONS

Gifts are any items, cash, awards, prizes, goods or services, offered without expectation of payment or benefit. Gifts also include goods or services offered at a discounted rate or on terms not available to the general public.

Hospitality is defined as food, drink, accommodation or entertainment (such as cultural or sporting events) provided free of charge, heavily discounted or on terms not generally available to the general public.

6. EXPECTATIONS

Generally, gifts and hospitality of nominal value (an estimated value of up to £25), such as small tokens of appreciation, may be accepted. These do not have to be pre-approved or recorded on the gifts and hospitality register. If in any doubt, individuals should seek advice from either members of the Executive Team, or the school's Senior Leadership Team.

Similarly, hospitality such as working lunches may be accepted in order to maintain good relationships with key contacts, provided the hospitality is reasonable in the circumstances. If in doubt, advice must be sought from either members of the Executive Team, or the school's Senior Leadership Team.

People working with or for TEAL:

- Must not give or accept gifts or hospitality to or from a third party where it might be perceived that their personal integrity has the potential to be compromised, or that TEAL might be placed under any obligation as a result of acceptance
- Must not use their official position to further their private interests or the interests of others
- Must not solicit gifts or hospitality
- Must consult members of the Executive Team or school's Senior Leadership Team before accepting or offering any gifts or hospitality with an estimated value of over £25. All offers of gifts or hospitality with an estimated value of over £25 must be declared via the Central Administrative Team, who will ensure the declaration is logged on the gifts and hospitality register. Declarations should be made within 10 working days of the gift or hospitality being offered. Staff who receive a collective gift from a class/group of pupils do not need to declare the gift, unless the collective gift is worth more than £100.

The PROVEIT test is helpful in assessing whether a gift or hospitality offered is acceptable:

- Purpose – token, thanks or favour? (token or thanks = yes; favour = no)
- Rules – does this situation conform with our rules?
- Openness – is the offer transparent?
- Value – expensive or inexpensive?
- Ethics – does the offer fit with our purpose, ethics and values?
- Identity – who has made the offer?
- Timing – are you about to make a decision affecting the giver?

We encourage and seek cooperative relationships with stakeholders and external organisations. Accordingly, there may be occasions where it is appropriate for TEAL to provide and fund limited gifts or hospitality. Likewise, it may be appropriate for gifts to be provided to staff (e.g. long service awards; recognition and thanks).

Any gifts or hospitality provided by TEAL, such as a working lunch for visitors, must not be extravagant. A maximum value of £25 per head should be used as a guideline.

Expense claims should be made to the Finance Department and receipts must always be attached. The CFO or another member of the Executive Team in their absence, must be consulted in advance about any proposal to provide gifts or hospitality with a value of over £25.

7. GIFTS AND HOSPITALITY REGISTER

The Central Administrative Team will ensure that:

- TEAL maintains a gifts and hospitality register, which is monitored by the Executive Board and the Audit and Risk Committee
- Provide figures for transactions relating to gifts made by TEAL to the CFO to be disclosed in TEAL's audited accounts (where required), in accordance with the Academy Trust Handbook
- All Members, Trustees and Governors are made aware of this policy

8. UNACCEPTABLE GIFTS AND HOSPITALITY

The following must never be offered or accepted:

- Monetary gifts
- Gifts or hospitality offered to family members, partners or close friends
- Gifts or hospitality from a potential supplier or tenderer in the immediate period before tenders are invited or during the tendering process. The agreed cooling off period is 12 months.
- Lavish or extravagant gifts or hospitality, even if they relate to activities the recipient undertakes in their own time

This is not an exhaustive list.

9. DECLINING GIFTS AND HOSPITALITY

Anyone working with or for TEAL, who is offered an unacceptable gift or hospitality, should politely decline the offer.

If they feel it would not be appropriate for them to decline, they should refer the matter to the CFO, or another member of the Executive Team in their absence, who may decline the offer, or donate the gift or hospitality to a worthy cause, ensuring this is recorded on the gifts and hospitality register.

Failure to decline gifts or hospitality TEAL has deemed unacceptable may result in disciplinary action. If a breach of this policy is deemed to contravene law or a statutory regulation, we may notify the appropriate authorities.

10. MONITORING COMPLIANCE WITH AND EFFECTIVENESS OF THE POLICY

Effectiveness and compliance of this policy will be monitored by the Audit and Risk Committee on a six monthly basis.

11. REVIEW

This policy will be reviewed within two years of the date of implementation.

DECLARATION OF HOSPITALITY AND GIFTS FORM

Receiving benefits, gifts or hospitality in return for providing services (even if these services are part of a usual role) can be perceived as an inducement to show favour to a person or organisation in their official capacity. People working with or for TEAL are advised to decline such offers, but it is acknowledged that there may be occasions when this is not feasible. All Members, Trustees, Governors, other volunteers and staff should conduct themselves with integrity, impartiality and honesty at all times and should maintain high standards of propriety and professionalism.

If you have received or have been offered a gift or hospitality with an estimated value of more than £25, please complete this form and return to the Central Administrative Team (admin@theeducationalalliance.org.uk).

Details of the person receiving the Gift or Hospitality

Full name	
Base school	
Job title	
Date	
Signature	

Description of Gift or Hospitality

Description of gift/hospitality	
Actual or estimated value	
Purpose of the offer	
Person/organisation providing the gift/hospitality	
Relationship (or future relationship) with the person/organisation providing the gift/hospitality	
Gift/hospitality accepted	YES/NO
Any other comments	

Decision made by

Full name	
Base school	
Job title	
Date	
Signature	

Register of Gifts and Hospitality

Name	School	Name of Company	Nature of gift/hospitality	Estimated value of gift/hospitality	Accepted: Yes/No	Date of Decision