

# Warriner Multi Academy Trust

Registered in England & Wales Company No. 9696059

## GIFTS AND HOSPITALITY POLICY

### Aims

The Warriner Multi Academy Trust (WMAT) is committed to the highest level of integrity, honesty and accountability in all its business dealings. All Members of the Warriner Multi Academy Trust, Directors, Governors and staff are expected to maintain high standards of propriety and professionalism in all their dealings, ensuring they are free from any conflict of interest through their business in the name of the Multi Academy Trust.

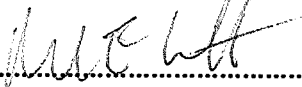
### Objectives

- To ensure the WMATs legal responsibilities are met with regards to gifts and hospitality in particular with regard to the Prevention of Fraud and Bribery Act 2010.
- To ensure all members of the WMAT understand when gifts and hospitality can be accepted and when they can not.
- To ensure a register of gifts and hospitality is maintained and reviewed.

### Roles and responsibilities

- The Directors must ensure the policy is reviewed regularly and kept up to date with legal changes.
- The head teacher or Business manager must maintain a register of gifts and hospitality for their school including the local governing body. (Annex 1) They must carry out annual checks to ensure that items recorded in the Register are properly accounted for. They must ensure any items are held securely until allocated.
- All staff and governor must report to the head teacher or business manager of their school, any gifts or hospitality received in line with this policy.
- Directors must report to the Business Manager of the WMAT, any gifts or hospitality received, in line with this policy.
- The Chair of Governors (for Staff and governors of their school) or Chair of the WMAT Central Services Committee (for Directors of the WMAT) where procedures for accepting or declining the gift or hospitality are unclear, make the final decision, and inform the Business Manager/Head Teacher who will record that decision in the Register.

**This policy was approved by The Central Services Committee of The Warriner Multi Academy Trust Board of Directors on 26<sup>th</sup> April 2016, for use in all its schools.**

Signed by.....  5/5/16 ..... Chair of Committee

**Review Due; March 2019**

## Definitions

A gift is any item or service which is received free of charge; or personally offered at a discounted rate or on terms not available to the general public. All gifts and hospitality received (other than those of a minor nature) are not considered to be the property of the individual, but the property of the Academy, and should be recorded in accordance with this policy.

Hospitality is the offer of free drink, accommodation or entertainment or the opportunity to attend any cultural or sporting event not available to the general public

Donations to the WMAT are a separate issue, and are not covered by the scope of this policy.

**Prevention of Fraud and Bribery Act 2010** makes it a criminal offence to:

- Offer, promise or give a bribe,
- Request, agree to or accept a bribe,
- As an organization to fail to prevent bribery by those acting on its behalf ('associated persons') to obtain or retain business or a business advantage for the organisation.

Under this act, a bribe is a 'financial or other advantage' offered, promised or given to induce a person to perform a relevant function or activity improperly, or reward them for doing so.

## Gifts and hospitality of a minor nature

For the purpose of this policy, gifts of a minor nature are considered to be:

- Gifts from suppliers with an estimated value up to a maximum of £10.00
- Small gifts from those receiving a service from the Academy as a token of appreciation (e.g. from parents or pupils to teachers). It is common for appreciative parents and students to register their thanks for the work of staff in the form of a small personal gift. Gifts valued at under £30 can be accepted by the member of staff without reference to the Headteacher or Governing Body. Such gifts do not need to be added to the Gifts and Hospitality Register.
- Small promotional items from suppliers that are routinely given to a wide range of people (e.g. calendars, notepads, pens, etc).
- A working lunch of modest standards (less than £30 per head) to allow the parties to continue to discuss business already started (unless a tender or contract is currently under dispute or being negotiated).

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Gifts and hospitality of a minor nature do not need to be recorded in the 'Register of Gifts and Hospitality'.

## **Other gifts and hospitality**

Gifts exceeding an estimated value of £10.00 from a supplier should be reported to the Head Teacher or Business Manager and recorded in the Register of Gifts and Hospitality. Such gifts will not be kept by the individual, but will be placed in secure storage by the Office Manager and used for the benefit of the WMAT or local charities (e.g. in fundraising events, for raffle prizes, etc).

Gifts with an estimated value exceeding £50 should be referred to the Chair of Governors and/or Chair of WMAT Central Services Committee for consideration. The decision will be reported to the Business Manager, who will record the outcome in the Register of Gifts and Hospitality.

Hospitality in excess of a moderate working lunch (i.e. £30 or more) should not be accepted without the approval of the Chair of Governors or Chair of the WMAT Central Services Committee. All offers of hospitality, other than those of a minor nature, must be recorded in the Register of Gifts and Hospitality noting if the offer was accepted or declined.

If a gift or hospitality is offered whilst involved in the procurement of goods and services, tenders for work or when liaising with anyone conducting business with one of the WMAT schools, for anything other than light refreshments the offer must be referred to the Headteacher for consideration. Gifts or Hospitality offered to the Headteacher must be referred to the Chair of Governors. If approved, this would need to be added to the register.

If not accepting a gift would cause offence, (such as a sudden and unexpected gift, or one where it would cause cultural offence) the item should be accepted. The matter should then be brought to the attention of the Headteacher as soon as possible who may decide to return the gift, discuss with the Chair of Governors, and/or donate it to a school raffle or other charitable cause.

Examples of gifts or hospitality that should not be accepted in any circumstances are cash or monetary gifts; gifts or hospitality offers to a member of your family; gifts or hospitality from a potential supplier if tendered in the immediate period before tenders are invited or during the tender process.

## **Non compliance**

If it is believed that a Member of the Multi Academy Trust, a Governor or a member of staff has not declared a gift or hospitality a formal investigation will be carried out and formal procedures, including disciplinary procedures where appropriate, may be instigated.

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## Annex 1

### WMAT Gifts and Hospitality Register

Name of School:

*All gifts and hospitality not considered minor (more than £10 for gifts from suppliers and more than £30 for hospitality, as per the gift and hospitality policy) must be recorded. Gifts must be used for the benefit of the WMAT or given to charity and not the individual.*

Date	Estimated value of gift/hospitality	Recipient	Donor	Nature of Gift/hospitality	Decision to accept/decline referred to?	Outcome referred decision	Gift allocated to