

The 3-18 Education Trust

Gifts and Hospitality Policy

Every individual is in a great school.

Approved: Spring Term 2023

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Introduction

The 3-18 Education Trust (Trust) is committed to the values of probity and accountability. All Members, Trustees, Local Governors, should conduct themselves with integrity, impartiality and honesty at all times. Staff should maintain high standards of propriety and professionalism.

The guiding principles are:

- The conduct of individuals should not create suspicion of any conflict between their official duty and their private interest.
- The action of individuals acting in an official capacity should not give the impression to any member of the public, to any organisation with whom they deal or to their colleagues that they have been (or may have been) influenced by a benefit to show favour or disfavour to any person or organisation.

Purpose and Scope

This policy applies to all Members, Trustees, and Local Governors. Procedures apply to gifts from students and their families as well as from potential suppliers.

Hospitality received from or the giving of hospitality to a third party is generally not acceptable. The exception to this general principle is where there is a genuine need for the development of legitimate and ethically sound business relationships and the hospitality offered will genuinely assist the development of this.

Even then only modest hospitality is acceptable AND the following procedures must be always complied with. Any gift or hospitality over the value of £30 needs to be declared.

Definitions

For the purpose of this policy:

- “hospitality” means any form of gift, entertainment, personal reward or favour or anything of value;
- “modest” means low cost and moderate frequency and level;
- “trivial” means a very small low value item such as a calendar, pen, a small box of chocolates or a very small promotional item.

Hospitality

Hospitality can take a variety of forms, some of which Members, Trustees, and Local Governors, may accept, some of which should be declined.

Members, Trustees, and Local Governors may be offered hospitality as a normal business practice in a way that is directly linked to their role. Examples of this kind of hospitality include the offer of refreshments at business meetings or the offer of lunch or dinner at the end of an official engagement. This kind of conventional hospitality may be accepted.

Members, Trustees, and Local Governors may also be offered other forms of hospitality which are not related to their role and are not linked to Trust or school business. This might include substantial offers of social functions, travel or accommodation, offers of tickets and invitations to sporting, cultural or social events. These forms of hospitality should be declined.

If any Member, Trustee, and Local Governor, is in doubt about whether it is appropriate to accept any offer of hospitality, the advice of the Governance Professional or Chief Executive Officer should be sought, who may also seek the advice of the Finance Director.

Members, Trustees, and Local Governors must never canvass or seek gifts or hospitality.

Gifts

Members, Trustees, and Local Governors should not accept gifts or rewards from any organisation or individual with whom they have contact in the course of their position in the Trust as an inducement either for doing something or not doing something in their official capacity. Particular care should be taken about any gift from a person or organisation which has, or is hoping to have, a contract with the Trust or school. Gifts of a trivial or inexpensive nature may be accepted (e.g. diaries, calendars), but more substantial or expensive offerings should be declined.

Gifts are deemed to include:

- Goods provided for personal or other private use.
- Personal services.
- Loans of equipment, vehicles etc. for personal use.
- The provision of goods / services at preferential cost for personal or other private use.

If unsolicited gifts of a substantial nature arrive from contractors, they should be returned with a polite explanation that the Trust's policies do not allow their acceptance.

Sponsorship

Where an outside organisation wishes to sponsor or is seeking to sponsor the Trust or a school, whether by invitation, tender, negotiation or voluntarily, the basic conventions concerning acceptance of gifts or hospitality apply. Care must be taken when dealing with contractors/suppliers or potential contractors/suppliers.

Where the Trust/school wishes to sponsor an event or service, neither staff nor any relative or those in a close personal relationship must benefit from such sponsorship, either directly or indirectly, without there being full disclosure to the Chair of the Trust Board and the CEO of any such interest. Similarly, where the Trust/school through sponsorship, grant aid, financial or other means, gives support in the community, Members, Trustees, and Local Governors should ensure that impartial advice is given and that there is no conflict of interest involved.

Personal Purchases

Caution should be exercised when for their personal use Members, Trustees, and Local Governors buy goods or use the services of suppliers which they know have dealings with the Trust.

Members, Trustees, and Local Governors should not accept prices or terms for such goods or services which they believe may have been reduced for them personally because of the supplier's dealings with the Trust, similarly, they should not seek such reductions.

Gifts and Hospitality Offered by the Trust

Members, Trustees, and Local Governors must be mindful that the value of all gifts and hospitality offered by the Trust are sourced from public funding, and the expectation is that such funding will be used for legitimate purposes and demonstrate value for money.

To achieve propriety in the use of public funds, gifts for members of staff who are leaving or have a personal celebration should only be bought with voluntary contributions from colleagues. In exceptional circumstances it may be appropriate for the Trust to provide a gift of up to £30.00 in value, for example:

- Providing a bouquet of flowers to a seriously ill employee, or to a longstanding employee who is retiring.
- Giving a box of chocolates to someone who has provided services free of charge.

It may be appropriate to consider a charitable donation through voluntary contributions instead.

Alcohol must never be purchased as a gift under any circumstances.

It is acceptable for the Trust to provide modest hospitality in the way of working lunches and/or dinners to existing and potential contractors and stakeholders subject to a genuine business reason.

Registration of Gifts and Hospitality

Members, Trustees, and Local Governors must record being offered or accepting any gifts by making a declaration to the Governance Professional and Finance Director. The Finance Director will maintain a register of gifts and hospitality for the Trust. It will be the responsibility of individuals to notify the Governance Professional and Finance Director of all gifts and hospitality offered/received in line with this policy.

Members, Trustees, and Local Governors should make a declaration as soon as possible after the offer or receipt of gifts or hospitality. It is recommended that Members, Trustees, and Local Governors make declarations by email and retain a copy for their personal records. Declarations must include the following information:

- date of offer of gift or hospitality;
- the recipient's name, position and associated school/organisation within the Trust;
- who has offered the gift
- description of the gift or hospitality received or declined;
- reason given for offering the gift or hospitality;
- estimated value of the gift or hospitality;
- whether the gift or hospitality was accepted or declined.

For example:

Date received	Recipient (Name and position)	Received from (Name / organisation)	Description of Gift/ Hospitality offered	Value £ (Estimate if unknown)	Reason given for providing gift/hospitality	Accepted or Declined
1 March 2021	Jane Smith, Headteacher, ABC School	John Jones (Jones Enterprises)	Desktop Printer	Approx. £80.00	Sent with tender for printing services	Declined

Members, Trustees, and Local Governors should be aware that it is a serious criminal offence to corruptly receive or give any gift, loan, fee, reward or advantage as an inducement to act in a certain way in their professional capacity. If an allegation is made, Members, Trustees, and Local Governors must be able to prove that any such reward has not been corruptly obtained.

Policy Monitoring and Review

Monitoring

The Chief Executive Officer and Governance Professional will monitor the outcomes and impact of this policy on an annual basis.

Review

Member of Staff Responsible	Chief Executive Officer
Relevant Guidance/Advice/Legal Reference	Chartered Governance Institute UK & Ireland Charity Commission
Policy Adopted By	Trust Board
Date of Policy	Spring Term 2023
Review Period	3 Years
Date of Next Review	Spring Term 2026