



**STOUR VALE
ACADEMY
TRUST**

GIFTS AND HOSPITALITY POLICY

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Stour Vale Academy Trust is committed to the highest level of integrity, honesty and accountability in all its business dealings. All Members, Trustees, staff and Local Governing Body Members 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 Trust.

1.0 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.

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

Bribery Act 2010 makes it a criminal offence to:

- Offer, promise or give a bribe,
- Request, agree to or accept a bribe,
- (by an organisation) 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.

The acceptance of gifts and hospitality is a sensitive area where actions can easily be misconstrued. Unlike private industry, the actions of public sector employees are totally open to public scrutiny. Any gifts, rewards and benefits that are disproportionately generous or that could be seen as an inducement to affect the Trust's decision should be declared.

The following general rules apply and must guide decisions on receipt of gifts and hospitality as an employee or member, trustee or governor of Stour Vale Academy Trust.

- To accept gifts should be an exception. You may accept small 'thank you' gifts of token value, such as a diary, mug or a bunch of flowers, not over the value of £30.
- You should notify the Chief Finance Officer of any gift over this value for entry in the Gifts and Hospitality Register.
- An exception to this value limit may be any end of year gifts from pupils which are common for teachers, and a sensible approach should be taken in notifying the Chief Finance Officer of any gifts of an unusually high value.
- Always say no if you think the giver has an ulterior motive. Be sensitive to the possibility that the giver may think that even small gifts or simple hospitality will elicit a prompter service or preferential treatment.

- Never accept a gift or hospitality from anyone who is, or may be in the foreseeable future, tendering for any contract with the Trust, seeking employment with the Trust or is in dispute with the Trust, even if you are not directly involved in that service area.
- Where items purchased for the Trust include a 'free gift' such gift must either be used for Trust business or handed to the Chief Finance Officer to be used for charity raffles.
- A gauge of what is acceptable in terms of hospitality is whether Stour Vale Academy Trust would offer a similar level of hospitality in similar circumstances.
- Occasional working lunches with customers, providers or partners are generally acceptable as a way of doing business provided they are not to an unreasonable level or cost.
- Invitations to corporate hospitality events must be judged on their merit. Provided the general rules have been taken in to account it may be acceptable to join other company/organisation guests at
 - a) sponsored cultural and sporting events or other public performances as a representative of the Trust
 - b) special events or celebrations

Consider the number of these events, and always take into account what the public perception would be if they knew you were attending.

- Paid holidays or concessionary travel rates are not acceptable for personal use. Neither are offers of hotel accommodation nor the use of a company villa/apartment.
- If you are visiting a company to view equipment that the Trust is considering buying, you should ensure that expenses of the trip are paid by the Trust. Acceptance of refreshments and/or a working lunch may be acceptable but care must be taken to ensure that the Trust's purchasing and/or tender procedures are not compromised.
- Acceptance of sponsored hospitality that is built into the official programme of conferences and seminars related to your work are acceptable. Inspection visits for school trips are also accepted.
- Offers to speak at corporate dinners and social gatherings or events organised by a professional body where there is a genuine need to impart information or represent the Trust must be agreed in advance with your Headteacher. Where your spouse or partner is included in the invitation and approval has been given

for you to attend, it will be acceptable for your spouse or partner to attend too, if there are expenses incurred these must be met personally.

- Any invitation you accept should be made to you in your professional/working capacity as a representative of the Trust.

If not accepting a gift would be regarded as causing 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 or CEO as soon as possible who may decide to return the gift, discuss it with the Chair of Board of Trustees, or may donate it to a trust raffle/fair or a charitable cause.

2.0 Trust provided gifts to staff

The Trust and its constituent schools may provide gifts to staff such as flowers or suitable alternative. This is allowable in the following circumstances only:

- Death of a spouse/close relative

The gift must not include the purchase of alcohol and the total value of any gift must not exceed £30.

3.0 Leaving gifts for a volunteer/trustee/governor

Where in the best interests of the Trust it may be appropriate to buy a small gift as a leaving or retiring present for a trustee, governor or volunteer who has given an exceptional length of service.

The gift must not include the purchase of alcohol and the total value of any gift must again not exceed £30.

If you are in doubt about the acceptability of any gift or hospitality given or received then it is your responsibility to consult the Chief Finance Officer or the CEO.